

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## Jiangsu Zhongji Lamination Materials Co., Ltd

CERTIFICATE NUMBER

37

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

5 AUGUST 2025

DATE OF EXPIRY

4 AUGUST 2028

CERTIFIED SINCE

5 AUGUST 2019

AUTHORISED BY

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CERTIFICATION SCOPE

Jiangsu Zhongji Lamination  
Materials Co., Ltd is located in  
Lingang New City Development  
Zone, Jiangyin City, Jiangsu  
Province, China. Mainly produces  
Aluminium and Aluminium alloy foil.

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)*

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
CERTIFICATION SCOPE	Jiangsu Zhongji Lamination Materials Co., Ltd is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces Aluminium and Aluminium alloy foil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (12 – 13 June 2019)</li><li>Surveillance Audit (26 – 27 September 2021)</li><li>Re-Certification Audit (29 – 30 August 2022)</li><li>Surveillance Audit (3 – 4 July 2024)</li><li>Re-Certification Audit and Scope Change (28 – 29 April 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>12 – 13 June 2019 (Initial Certification Audit)</li><li>26 – 27 September 2021 (Surveillance Audit)</li><li>29 – 30 August 2022 (Re-Certification Audit)</li><li>3 – 4 July 2024 (Surveillance Audit)</li><li>28 – 29 April 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>23 June 2019 (Initial Certification Audit)</li><li>13 October 2021 (Surveillance Audit)</li><li>11 November 2022 (Re-Certification Audit)</li><li>2 September 2024 (Surveillance Audit)</li><li>5 June 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 13 June 2019)</u></p> <p>Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces Aluminium and Aluminium alloy foil.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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#### Surveillance Audit (26 – 27 September 2021)

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces Aluminium and Aluminium alloy foil.

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

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

#### Re-Certification Audit (29 – 30 August 2022)

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces Aluminium and Aluminium alloy foil.

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

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

#### Surveillance Audit (3 – 4 July 2024)

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces Aluminium and Aluminium alloy foil.

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

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

#### Re-Certification Audit and Scope Change (6-7 January 2025)

The Audit Scope includes manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

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

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AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	5 August 2025 – 4 August 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	4 August 2027

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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

Established in 2004, Jiangsu Zhongji Lamination Materials Co., Ltd (the ‘Entity’) specialises in the production and sale of Aluminium foil Products. In 2024, it produced and sold 72,000 tonnes of Aluminium foil.

The Entity covers an area of approximately 170,000 square metres and employs around 550 full-time staff. Its infrastructure includes administrative offices, testing laboratories, canteens, production workshops, raw material, finished product and Waste storage warehouses.

The Entity is located about five kilometres from Shengang Town, Jiangyin City, Jiangsu, China. There are no nearby Protected Areas, World Heritage sites, or religious Facilities. The primary environmental receptor relating to the Entity is the Shengang River, which borders the southern edge of the site.

Key external Stakeholders include the Lingang Development Zone Management Committee, Nanjing University of Science and Technology, and the Binjiang Village Committee. Production activities continue to ensure the rights and interests of the Entity and its Stakeholders.

## 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
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that comply with the legal requirements. It has implemented systems to ensure awareness of, and Compliance with Applicable Law and provides relevant training to employees.
1.2 Anti-Corruption	Conformance	The Entity has established Policies and procedures to address anti-Corruption issues, including a Gift and Entertainment Policy and a 'whistleblowing' mechanism. An Anti-Corruption Commissioner has been appointed by the Entity and targeted training is provided to the high-risk employees. A misconduct register is maintained, with no Corruption cases reported in the past three years.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles on environmental, social and governance performance. It takes appropriate measures—including training and communication to raise awareness of the Code amongst its Business partners and suppliers. Both the Code of Conduct and Responsible Sourcing Policy are published at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428111402.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428111402.pdf</a> and <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250425040019.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250425040019.pdf</a>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity implements management Policies aligned with ESG practices, with senior management demonstrating clear commitment. Policies are reviewed during the annual management review, or when significant changes or control gaps arise. The Policies are accessible to internal and external Stakeholders at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429021722.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429021722.pdf</a>
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative with overall responsibility for ensuring Compliance with the ASI Performance Standard, including leading the communication of related requirements and Policies through training and on-site postings.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented a documented an Environmental Management System and holds a valid ISO 14001:2015 certification. The most recent external Audit by CQC conducted in December 2024, reported no nonconformities.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. Key social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes to support responsible sourcing. It conducts second-party Due Diligence Audits of major next-tier suppliers' sites as part of the qualification process. The procurement team and relevant staff receive annual training on responsible sourcing requirements. The Responsible Purchasing Policy is reviewed during the annual management review and updated as needed if there is a Major Change or control gap. The Responsible Purchasing Policy is available at:</p> <p><a href="http://www.zjalufoil.com/WebEditor/upload/download/20250425040019.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250425040019.pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as it has not initiated any New Projects or made Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as it has not initiated any New Projects or made Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has established a Comprehensive Emergency Response Plan, a Special Emergency Plan, and an Environmental Emergency Plan. The Environmental Emergency Plan is registered with relevant Government agencies in Compliance with legal requirements. The Entity provides relevant training to employees and conducts emergency drills. Both emergency response plans are reviewed every three years or when Major Changes or control gaps arise and are re-submitted to authorities for registration. The Plans are available at:</p> <p><a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428022855.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428022855.pdf</a></p> <p>and</p> <p><a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428044211.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428044211.pdf</a></p> <p>However, the Environmental Emergency Plan has not been updated in a timely manner.</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity and Resumption Plan, which is formally reviewed and approved by senior management.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for Mergers and Acquisitions. No such instances have occurred in the past three years. The Entity commits to re-examining environmental, social, and governance issues during Due Diligence in any future transactions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for Closure, Decommissioning and Divestment in Compliance with the ASI Performance Standard. No such instances have occurred in the past three years. The Entity commits to re-evaluating relevant environmental, social, and governance issues in any future Closures, Decommissioning, or Divestments.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and Material environmental, social, and economic impacts in its 2024 Sustainability Report, available at:

CRITERION	RATING	COMMENT
		<a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	No monetary fines, judgments, penalties or non-monetary sanctions were recorded for 2024. This was verified through management interviews and reviews of official government and Non-Government Organisation (NGO) websites. The information is disclosed in the 2024 Sustainability Report on page 8 available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity's 2024 Financial Audit Report, verified by a third-party audit firm, discloses legally required payments to governments, such as taxes, with no other payments reported. The Entity has implemented an anti-Corruption Policy. The annual accounting report is available at: <a href="http://www.szse.cn/disclosure/listed/bulletinDetail/index.html?f002f37d-94a2-4e70-a5b6-797a88ab846b">http://www.szse.cn/disclosure/listed/bulletinDetail/index.html?f002f37d-94a2-4e70-a5b6-797a88ab846b</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented internal and external 'whistleblowing' Complaints and Grievance Mechanisms, including hotlines, email, and suggestion boxes, of which all are available at: <a href="http://www.zjalufoil.com/contact/">http://www.zjalufoil.com/contact/</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has engaged a third party to conduct an Environmental Life Cycle Assessment (LCA) in Compliance with ISO 14040 and ISO14044. Since all products share the same production processes, the assessment covers all production lines. The 'cradle-to-gate' LCA evaluates the environmental impacts of production stages and Waste treatment.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Environmental Life Cycle Assessment Report is published on the Entity's official website at: <a href="http://zjalufoil.com/WebEditor/upload/download/20250425040115.pdf">http://zjalufoil.com/WebEditor/upload/download/20250425040115.pdf</a> The Report details the underlying assumptions and system boundaries and can be provided to customers upon request.
4.2 Product Design	Conformance	The Entity has established a process to set clear sustainability objectives during product or component design and development, including consideration of the end product's environmental life cycle impacts. It has also defined production Conformance rates to minimise Waste generated during manufacturing.
4.3a-b Aluminium Process Scrap	Conformance	Aluminium Process Scrap is collected, packaged, and sold to smelters or construction material manufacturers for recycling, with a 100% recycling rate. The Entity's risk analysis determined that the Scrap does not require separation before recycling.
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.



CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	Due to the absence of local, regional or national Aluminium Scrap collection and recycling systems in China, and as the Entity lacks a smelting process, it does not directly procure recycled Aluminium. In response to this, the Entity collaborates with customers and suppliers to gradually increase the recycled Aluminium content in raw materials, which is currently and approximately ten percent.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has established a greenhouse gas (GHG) emissions management programme. For 2024, it calculates GHG emissions in Compliance with ISO 14064, covering Scope 1 and 2 emissions, as well as Material Scope 3 sources. The GHG report is verified by a third party and publicly available at: <a href="http://zjalufoil.com/WebEditor/upload/download/20250425040049.pdf">http://zjalufoil.com/WebEditor/upload/download/20250425040049.pdf</a></p> <p>However, the Entity has used inappropriate emission factors for its calculations.</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>2022 has been set by the Entity as the baseline year. The Entity has used the ASI Entity GHG Pathways Calculation Tool to formulate a five-year greenhouse gas emission reduction plan which covers 2022 to 2028. This plan is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428034754.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428034754.pdf</a></p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity's GHG emission reduction plan from 2022-2028 is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428034754.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428034754.pdf</a></p> <p>Entity performance against GHG emission reduction targets is reviewed annually. In 2024, the Entity calculated the product carbon footprint and engaged a third party to verify the report and issue a verification statement. The results indicated that the 2024 GHG emission intensity meets the target set by the ASI Entity GHG Pathways Calculation Tool. The Entity's third-party verification statement is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429125808.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429125808.pdf</a></p>
5.4 GHG Emissions Management	Conformance	The Entity has established an energy Management System aligned with ISO 50001 and holds a valid certification. It also maintains a management process for GHG emission calculation and reduction, reviewing annual emission calculations, verification and the evaluation of reduction targets.

CRITERION	RATING	COMMENT
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has implemented plans to minimise adverse impacts from air emissions. Waste air generated during operations is collected and treated before release. Monitoring results confirm that the Entity's Emissions to Air comply with legal limits. The effectiveness of control measures is reviewed annually through internal Audits and management review meetings, in Compliance with ISO 14001 requirements. Material Emissions to Air from the Entity's 2024 activities are publicly available at: <a href="http://zjalufigil.com/WebEditor/upload/download/20250425035748.pdf">http://zjalufigil.com/WebEditor/upload/download/20250425035748.pdf</a>
6.2a-g Discharges to Water	Conformance	The Entity does not generate wastewater from its production process, and only sanitary wastewater is discharged. All discharges comply with local legal limits. Material discharges to water from the Entity's 2024 activities are publicly available at: <a href="http://zjalufigil.com/WebEditor/upload/download/20250425035748.pdf">http://zjalufigil.com/WebEditor/upload/download/20250425035748.pdf</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity conducts a risk assessment of operational areas where Spills and Leakages could contaminate air, water, or soil, using the Environmental Management System's risk assessment process. Based on the results, an Emergency Preparedness and Response Plan for chemical Spills and Leakages has been established. The Plan includes preventive measures and external communication procedures. Its effectiveness is reviewed annually through internal Audits and management review meetings. The risk assessment and control measures are publicly available at: <a href="http://zjalufigil.com/WebEditor/upload/download/20250425035918.pdf">http://zjalufigil.com/WebEditor/upload/download/20250425035918.pdf</a>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity as no Spills or Leakages have occurred since the Entity joined ASI.
6.5a-c Waste Management and Reporting	Conformance	Waste management practices at the Entity are governed by its Environmental Management System which follows the Waste Mitigation Hierarchy. Procedures for managing both Hazardous and non-Hazardous Waste are established and implemented. The types and quantities of Waste, along with the corresponding disposal methods, are outlined in Section 5 of the Entity's 2024 Annual Sustainability Report, available at: <a href="http://www.zjalufigil.com/WebEditor/upload/download/20250429040731.pdf">http://www.zjalufigil.com/WebEditor/upload/download/20250429040731.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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity only uses water sourced from the municipal water supply and identifies both the discharge and consumption source. Information on water withdrawal in 2024 is publicly disclosed on Section 6 in the Sustainability Report in 2024 at:

CRITERION	RATING	COMMENT
		<a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf</a> Information on wastewater discharge in 2024 is publicly disclosed at: <a href="http://zjalufoil.com/WebEditor/upload/download/20250425035748.pdf">http://zjalufoil.com/WebEditor/upload/download/20250425035748.pdf</a> Based on the approved EIA report, the water-related risk assessment was conducted. Due to the nature of the product and production processes and the local water environment, the water-related risk level is low. For more information, refer to: <a href="http://zjalufoil.com/WebEditor/upload/download/20250425035935.pdf">http://zjalufoil.com/WebEditor/upload/download/20250425035935.pdf</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as no significant water-related risks have been identified within the Entity's Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A Biodiversity and Ecosystem Services Impact Assessment covering the Entity's activities and Area of Influence was conducted by a qualified third party, based on the Environmental Impact Assessment (EIA) report. The assessment confirmed that due to the nature of the Entity's Products and production processes, there are no significant risks or impacts on Biodiversity or Ecosystem Services. Additionally, the Entity is not located in or near any Protected Areas. The Entity's Biodiversity Risk Report is available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429125905.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429125905.pdf</a>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services 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 treats all medium—wooden pallets, which is the medium used for the transportation of materials to and from the site.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's ASI Management Manual states that the Entity will not explore or develop New Projects or make Major Changes within World Heritage Properties. There are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	There are no Protected Areas within the Entity's Area of Influence, which has been confirmed by the local government agency and verified through its official website.
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	Conformance	<p>The Entity has implemented a Human Rights Policy, including a commitment to gender equity, and has communicated it to all employees. The Policy is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429125750.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429125750.pdf</a></p> <p>A Human Rights Due Diligence process has been established and implemented, including the mapping of Affected Populations and Organisations. Human Rights risks are identified and assessed. The Entity's Supplier Code of Conduct is communicated to key suppliers, and corresponding mitigation and control measures are in place. Audit reports indicate no adverse cases, and no negative information related to Human Rights has been identified regarding the Entity or its key suppliers.</p> <p>The Human Rights Due Diligence process is reviewed during the annual management review meeting. Affected Populations and Organisations, including neighbouring Businesses and employees around plant locations, have been identified through Compliance management and risk control procedures. The Entity's Human Rights Risk Assessment Report indicates that the impact on the Human Rights of those within its Area of Influence is minimal.</p> <p>The Entity actively engages with Affected Populations and Organisations through the management committee of the industrial zone in which it operates. The Human Rights Impact Assessment Report is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250428013410.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250428013410.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies respecting women's rights and a programme to promote gender equity and women's empowerment throughout the employment process. No complaints have been received from women Workers. Interviews with female employees confirm their awareness of their rights, with no negative feedback reported. The Entity regularly assesses this programme, and the assessment report is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429125750.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429125750.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity 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 to the Entity 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
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 within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	Policies and procedures to protect Cultural and Sacred Heritage have been established by the Entity. No Cultural or Sacred Heritage sites exist within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage sites, nor any Indigenous Peoples or their lands, territories and resources within its Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as the land was purchased from the local government, and no Resettlement or Displacement has been conducted by the Entity.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established a Policy committing to respect the legal and customary rights and interests of local communities concerning their lands, livelihoods, and use of natural resources. It implements Compliance management and risk control procedures to identify, prevent, monitor, and mitigate significant impacts from its activities, including those related to Health and Safety, social and cultural Human Rights and the environment.</p> <p>The Entity collaborates closely with the Industrial Estate Management Committee and engages Affected Populations and Organisations through Stakeholder consultations in developing management plans such as the Safety Contingency Plan and Environmental Contingency Plan.</p> <p>Additionally, the Entity actively supports community welfare activities organised by the Industrial Zone Management Committee, including public awareness campaigns on road safety, fire prevention, and telecommunications fraud prevention.</p> <p>The primary impact on neighbouring populations arises from the environmental effects of production activities, especially air pollutant emissions. To address this, the Entity has developed an environmental control plan in Compliance with legal requirements and regularly reports implementation status to the Environmental Protection Agency.</p> <p>The Management and Control Plan for the Impact of the Entity's Operational Activities on the Surrounding Environment is available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250710090924.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250710090924.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established a Policy committing to the non-use of conflict minerals and has established a Management System that includes supply chain mapping, risk assessment, control plans, Due Diligence Audits and reporting. The Entity provides training for all relevant employees and communicates the Policy and requirements to suppliers. All suppliers sign a Commitment Letter confirming their adherence to the non-use of conflict minerals.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts supply chain risk assessments to determine if materials originate from Conflict-Affected and High-Risk Areas (CAHRAs), based on communications with suppliers. The risk assessment report indicates that no materials come from these areas; all suppliers are based in China, and no critical Human Rights issues such as Child Labour or Forced Labour have been identified.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as no materials are sourced from CAHRAs and no ‘red flags’ were identified in the supply chain risk assessment.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>As part of its supplier Due Diligence process, the Entity identifies major next-tier suppliers, establishes a supplier Audit plan, and conducts second-party Due Diligence Audits at their sites. Compliance with requirements related to CAHRAs is included in the Audit criteria. Risk assessment records and supplier Audit reports from 2023 and 2024, confirm that no materials originate from these areas. The risk of conflict minerals is low, and no further action is required.</p> <p>The Entity’s Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and also addresses this requirement.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity commits to publicly reporting the performance of its supply chain Due Diligence on CAHRAs. The detailed results for its 2024 assessment are available in its annual Sustainability Report, page 19, at:</p> <p><a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429040731.pdf</a></p>
9.9 Security practice	Conformance	The Entity commits to respecting Human Rights in its engagement with public and private security providers, in Compliance with the ASI Performance Standard and best practices. Security personnel receive training on Labour Rights and job responsibilities and understand these requirements. No complaints have been received regarding security personnel conduct.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity respects the rights to Freedom of Association and Collective Bargaining. Elected Worker representatives, including approximately one-third female members and address Workers’ concerns with management. Both representatives and Workers interviewed demonstrate understanding of this mechanism.
10.2a-c Child Labour	Conformance	<p>The Entity has implemented a Policy that prohibits the use of Child Labour. Employee roster, site observations, and interviews with sampled workers confirmed that the youngest Worker employed by was 18 years old. No instances of Child Labour were identified.</p> <p>Candidate ages are verified through ID card checks and interviews, with copies of ID cards retained in personnel files as evidence of age verification.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking. It commits to upholding—and expects its suppliers to uphold—the prohibition of Forced Labour, slavery and Human Trafficking.</p> <p>Worker and management interviews, document reviews and site observations indicate that the Entity does not engage in, nor supports</p>

CRITERION	RATING	COMMENT
		<p>the use of Forced Labour or Human Trafficking. Workers are hired directly by the Entity, pay no recruitment fees, and are not required to provide deposits. No loans are issued to Workers, and they retain possession of their identity documents at all times. The Entity respects Workers' freedom of movement and imposes no unreasonable restrictions. Employees are free to terminate their employment with prior notice.</p> <p>The Entity's 2025 Modern Slavery Statement is publicly disclosed at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250425040143.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250425040143.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to a Policy of non-Discrimination. No instances of Discrimination have been reported. Interviews with Workers confirmed that they feel they are treated equally and fairly.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and their representatives. Communication channels are clearly published and accessible to all Workers.
10.6a-g Violence and Harassment	Conformance	<p>The Entity respects its employees and ensures that all disciplinary measures comply with legal requirements and require confirmation from the Worker involved. The Entity does not engage in, nor tolerate, the use of corporal punishment, mental or physical coercion, Harassment, or gender-based Violence, including sexual Harassment or verbal abuse. The Policy on Violence and Harassment is included in the Entity's ASI Policy, available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250429021722.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250429021722.pdf</a></p>
10.7a-c Remuneration	Conformance	The Entity has a defined wage structure, with basic wages set above the legal minimum. Total compensation meets Workers' basic needs. All wages are documented and paid via bank transfer on the 15 <sup>th</sup> of the following month, and Workers receive their payslips on the same day.
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours are recorded manually and monitored to ensure Compliance with China Labour Law, which stipulates a standard 40-hour workweek (five days per week) and a maximum of three hours of Overtime per day. The Entity holds a valid Comprehensive Working Hours Approval, with annual total working hours not exceeding 2,432 hours. Total weekly working hours remain below 60, and employees are guaranteed at least one day off in every seven.</p> <p>However, among the sampled data of 30 Workers, two employees from the Packaging Department averaged 9.1 working hours per day over the past six months, due to line adjustments and changes in shift scheduling.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their rights and maintains open communication and cooperation with them. National laws and regulations in China are fully respected and complied with.

## 11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity establishes, implements, maintains, and continually improves a documented Occupational Health and Safety (OH&S) Management System and holds ISO 45001:2018 certification. The scope of the ISO 45001 certifications covers the entire ASI Certification Scope.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	In Compliance with ISO 45001 requirements, the Entity periodically monitors the performance of its OH&S Management System through annual internal Audits and management review meetings. When control gaps, non-conformities, or incidents are identified, the Entity reviews the relevant processes to improve the system. The Entity's OH&S performance is publicly available at: <a href="http://www.zjalufoil.com/WebEditor/upload/download/20250603035918.pdf">http://www.zjalufoil.com/WebEditor/upload/download/20250603035918.pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a system for Worker consultation and participation in Health and Safety. Employees are encouraged to report Health and Safety concerns and engage in improvement initiatives through mechanisms such as a proposal system and KPI setting. Worker representatives regularly attend OH&S meetings, to collaborate with management to address concerns and develop solutions as required.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	5 August 2019	Initial Certification Audit – Full Certification
1	10 November 2021	Surveillance Audit
2	2 December 2022	Re-Certification Audit – Full Certification
3	20 September 2024	Surveillance Audit
4	4 August 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change corrects the incorrect application of Supply Chain Activities.