

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Sunho New Materials Technology Co., Ltd.

CERTIFICATE NUMBER

487

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

25 AUGUST 2025

DATE OF EXPIRY

24 AUGUST 2028

CERTIFIED SINCE

25 AUGUST 2025

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Manufacture of Aluminium and
Aluminium alloy foils at Sunho New
Materials Technology Co., Ltd.,
Shangqiu, China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD
ENTITY NAME	Sunho New Materials Technology Co., Ltd.
CERTIFICATION SCOPE	Manufacture of Aluminium and Aluminium alloy foils at Sunho New Materials Technology Co., Ltd., Shangqiu, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">16 – 18 June 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 July 2025
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium and Aluminium alloy foils at Sunho New Materials Technology Co., Ltd., Shangqiu, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	25 August 2025 – 24 August 2028

NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	24 February 2027
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CERTIFICATE NUMBER	487
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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.

ENTITY OVERVIEW

SUNHO New Materials Technology Co., Ltd. (the ‘Entity’) is a subsidiary of the Henan SUNHO Group. The Entity occupies an area of nearly 300,000 square metres (m²) and is divided into Workshop One and Workshop Two, with an annual production capacity of 115,000 tonnes of double-zero Aluminium foil and battery foil. The Aluminium foil thickness ranges from 4.5 to 20 microns (µm). The Entity’s main equipment includes 14 Aluminium foil rolling mills, 6 roll grinders, 14 slitting machines, 35 precision cutting machines, and 40 30-tonne annealing furnaces.

The Entity has obtained certifications for ISO9001, ISO14001, ISO45001, ISO50001, ISO22000, IATF 16949 management system Standards, as well as Level 3 certification for standardised work safety enterprises.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The management process for the identification and assessment of ASI-related Legal Compliance requirements and other requirements is established and implemented. A compliance evaluation is conducted annually and the result is recorded. The compliance status of the legal and other requirements is reviewed in the annual management review meeting.
1.2 Anti-Corruption	Conformance	The Entity has established and implements a Policy and procedures to manage Corruption. The Entity has developed and implemented 'whistleblowing' mechanisms (e.g., a suggestion box, hot line: 0370-3158815, and mailbox: shxcjic3158815@163.com). The 'whistleblowing' channel is communicated to the employees and interested parties. Relevant anti-Corruption training is provided to employees in higher-risk positions. The anti-Corruption Policy is communicated to all suppliers, who return a signed commitment letter.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented training and communication to raise awareness of the Code among its business partners and suppliers. The Code of Conduct is reviewed in the annual management review meeting, or when there is a major change or control gap. The Code of Conduct is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3814
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented management Policies on environment, Human Rights and governance, which are consistent with ESG practices. The Entity's senior management has demonstrated a commitment to the implemented Policies. The Policies are reviewed at the annual management review meeting, or when there is a major change or control gap. The Entity's Policies are publicly disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3813
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated. The responsibility and authority to establish, implement, maintain and continually improve the ASI Management System is clearly defined.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established, implemented, maintains and continually improves its ISO 14001:2015 certified Environment Management System. The Entity holds a valid ISO14001:2015 certificate. One minor non-conformance was raised during the latest audit, with the corrective actions approved by the audit firm and the non-conformance is now closed.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established, implemented and maintained its Social Management System in accordance with the ASI Performance Standard and ISO 45001:2018. Social management risks and potential impacts have been assessed and relevant management procedures have been established and implemented. The Entity holds a valid ISO 45001:2018 certificate, which was issued by CQM.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to responsible sourcing requirements. The Entity conducts second-party Due Diligence audits at major 'next tier' suppliers' sites to qualify them. The Entity's procurement team and relevant personnel undertake annual training on responsible sourcing requirements. The Entity's Responsible Sourcing Due Diligence Policy is disclosed at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3817</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has assessed environmental and social impacts, and an environmental and social impact management plan is established and implemented. The management plan is reviewed during the annual management review meeting or when there is a major business change or control gap. The Environmental and Social Impact Assessment, and the latest active version of the environmental and social impact management plan are both publicly disclosed at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3820</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has established and implemented procedures to identify and assess Human Rights impacts including a gender analysis and has established a relevant management plan to prevent, mitigate and, where necessary, remediate any Material impacts identified. The Entity has conducted a Human Rights Impact Assessment. The management plan is reviewed during the annual management review meeting, or when there is a major business change or control gap. The Human Rights Impact Assessments, and the latest active version of the environmental and social impact management plan is publicly disclosed at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3824</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds ISO 14001:2015 and ISO 45001:2018 certifications and has established Environmental Health and Safety Emergency Response Plans, developed in collaboration with safety experts and with local Government approval. The Plans include coordinated actions with neighbouring communities and organisations during emergencies. Annual drills assess their effectiveness, and employees undergo regular training. The Entity commits to reviewing and updating the Plans in response to organisational changes or any identified control deficiencies. The Plans are publicly available at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3836</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3835</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has identified situations where it may have to suspend or significantly alter operations due to factors outside its control, which considers Material adverse environmental, social and governance impacts, has assessed the relevant risk of these situations, and established the Business Continuity Plan to control/mitigate the adverse impacts. The Entity's ASI PS Management Manual defines the trigger for reviewing the Plan, which is based on ASI Performance Standard requirements.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established a management procedure for mergers and acquisitions based on the requirement of the ASI Performance Standard. No such activity has occurred since the Entity commenced operation in 2021.</p>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for closure, decommissioning and divestment based on the requirement of the ASI Performance Standard. No such case has occurred since the Entity commenced operation in 2021.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainability Report describes its approach to environmental, social and economic impacts and its Material environmental, social and economic impacts related to Principles in the ASI Performance Standard. The Sustainability Report 2024 is publicly disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3823
3.2 Non-compliance and Liabilities	Conformance	As defined within the Sustainability Report 2024, and as per the official websites of the relevant government agencies and non-government organisations (NGOs), no significant fines, judgments, penalties and non-monetary sanctions for failure have been raised by the relevant government agencies.
3.3a-c Payments to Governments	Conformance	Payments to Governments made by the Entity only include those legally required, including taxes, mandatory social insurance, supplementary pension and the housing pension. Payments to Governments is publicly disclosed in the Sustainability Report, Section 2.2 at: http://www.shalfoil.com/NewsDetail.aspx?ID=3823
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	A 'whistleblowing' or Complaints Resolution Mechanism has been established by the Entity. The hotline and email address are communicated to Stakeholders both internally and externally. To date, no complaints have been received. The 'whistleblowing' channel is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3821
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has established and implemented an Environmental Management System that is certified to ISO 14001:2015 and facilitates the identification and evaluation of the environmental impacts and risks associated with its production activities and products. Life Cycle Assessments (LCA) of the Entity's Aluminium foil products, including food packaging Aluminium foil and battery Aluminium foil, are conducted using ISO 14040 and ISO 14044 methodologies. The 'cradle-to-gate' LCA model assesses key processes such as raw material procurement, cold rolling, annealing, and slitting. The detailed LCA report is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3834 The calculation of the Global Warming Potential (GWP) in the LCA however, has used regional default values for China instead of the data provided directly by suppliers.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has publicly disclosed a comprehensive LCA report for its Products, using a 'cradle-to-gate' approach. It has committed to providing the full environmental LCA report through external communication upon request. The disclosed LCA information includes

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		<p>details on basic assumptions, system boundaries, and associated data, which are available at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3834</p>
4.2 Product Design	Conformance	The Products manufactured by the Entity are standard and specific product design and development activities is not required by the Entity. Production process optimisation is implemented to reduce the generation of wastes including in-process Scrap. The Entity establishes targets for each Product to improve the conformance rate in major processes to reduce waste generated from its manufacturing processes.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets and relevant management programs to minimise the generation of Aluminium Process Scrap from its own operations. All (100%) Process Scrap is collected and sent to suppliers for recycling. T Aluminium alloy types are separated, packaged, and identified accordingly.
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	Minor Non-Conformance	As there is not a complete local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity and its 'brother' company and supplier, Shangqiu Yangguan (Casthouse) are working with the customer to determine how to improve the recycling rate of Products at 'End of Life', however there is limited evidence that the Entity itself actively supports the development of recycling systems for Aluminium foil.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>In accordance with the ISO 14064 standard, the Entity has completed an organisational-level inventory of energy consumption and Greenhouse Gas (GHG) emissions. The accuracy and transparency of the data have been Third Party verified. The verification report indicates that the Entity's total GHG emissions for 2024 amount to approximately 1.2 million tonnes of CO₂eq, for Scope 1, Scope 2, and Scope 3 (Category 1) emissions in total. The Entity's GHG Inventory Report is available at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3839</p> <p>It was noted however that approximately 50% of the raw material emission factors were based on the regional average values from the 'Ecoevent' database for China, which may lead to a certain degree of discrepancy between the Entity's total carbon emissions and the actual data.</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 –	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Pathway aligned with the 1.5°C warming scenario, using the ASI GHG Reduction Pathway Calculation Tool. A baseline year of 2024 has been established. The Entity's GHG Emissions Reduction Plan aims to reduce Scope 1 and 2 emission intensity to 0.58 tonnes CO₂eq per tonne (t) of Aluminium and Scope 3 (Category 1) emission intensity to 10.6 t CO₂eq/t by 2028.</p> <p>The Entity however should further consider the deviation in the emission baseline caused by using database data in the GHG inventory and set a more accurate emission reduction baseline.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>Key strategies within the Entity's GHG Emissions Reduction Plan include optimising energy efficiency, improving processes, and sourcing 'low carbon' raw materials to reduce product carbon intensity. The Entity's 2024–2028 Greenhouse Gas Reduction Action Plan, including reduction targets and progress. The Plan is publicly available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3838</p> <p>Further information is available in the Entity's Sustainability Report (Energy Conservation and Emissions Reduction section): http://www.shalfoil.com/NewsDetail.aspx?ID=3823</p> <p>The Entity commits to annual reviews and public updates on progress and improvements to the reduction plan.</p> <p>However, some reduction initiatives within the Entity's GHG Emission Reduction Plan do not fully comply with the requirements of the ASI 1.5°C reduction scenario.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed a GHG Emission Reduction Plan that outlines management approaches for addressing Greenhouse Gas emissions, with a primary focus on energy management and 'low carbon' material procurement. Through site observations, document reviews, and interviews undertaken during the Audit, it was confirmed that the Entity follows the 'Plan-Do-Check-Action' (PDCA) approach to manage energy consumption and monitor the performance of its Management System. This systematic approach enables the Entity in achieving its GHG emission reduction goals effectively.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity collects and treats exhaust gases from manufacturing processes before their release, implementing its 'Exhaust Gas Emission Control Regulations' with specific measures to mitigate any adverse impacts. The Entity has disclosed its emissions data in its Sustainability Report (Chapter 3.7), indicating that concentrations and emissions of major air pollutants, including Volatile Organic Compounds (VOC), are well below statutory limits: http://www.shalfoil.com/NewsDetail.aspx?ID=3823</p> <p>Regular maintenance of air treatment facilities ensures their effective operation and compliance with established requirements.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has established water-saving targets and implemented a plan to reduce environmental impacts. It does not discharge production-related wastewater, and domestic sewage is managed</p>

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		through its Environmental Management System. The 2024 monitoring report confirms that major pollutants are systematically tracked, and discharge levels comply with local legal limits. Details on wastewater pollutant discharge management are disclosed in the annual Sustainability Report, Chapter 3.7: http://www.shalfoil.com/NewsDetail.aspx?ID=3823
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a comprehensive procedure to assess and manage risks related to Spills and Leakages, supported by detailed emergency response plans. Regular inspections are conducted to identify potential risks, and the Entity is committed to continuously improving its prevention and response measures, notably in response to internal changes or identified control weaknesses. The risk management and emergency response plans are available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3840
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 will be disclosed to potentially affected parties in the event of a Spill or Leakage incident. Over the past three years, no Spills have been reported. Information on spill management and prevention is available in the annual Sustainability Report, Section 3.8 'Environmental Protection and Sustainable Development': http://www.shalfoil.com/NewsDetail.aspx?ID=3823
6.5a-c Waste Management and Reporting	Conformance	Waste management is integrated into the Entity's Environmental Management System and adheres to the Waste Mitigation Hierarchy. The Entity emphasises Waste reduction through re-use and recycling strategies, reducing the volume generated, especially Hazardous Waste, per unit of product. Hazardous Waste disposal complies with applicable legal requirements. The quantities of Hazardous and Non-Hazardous Waste generated are disclosed in the annual Sustainability Report, Section 3, Table 3.7: http://www.shalfoil.com/NewsDetail.aspx?ID=3823
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has measured and documented its water withdrawal and usage across various sources and types of usage, as detailed in its Environmental Impact Assessment and Water Resource Risk Assessment. It has conducted a thorough evaluation of water-related risks, considering the local water environment, withdrawal and discharge conditions, and the effectiveness of existing management practices. The Entity's assessment concludes that its water resource risk has been assessed as low, with no significant water-related risks identified within its Area of Influence. A comprehensive risk

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		assessment, along with information on annual water consumption, is available in the Water Resources Risk Assessment Report, available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3826
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no identified significant water-related risks within its Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A detailed Environmental Impact Assessment (EIA), encompassing an evaluation of Biodiversity and Ecosystem Services, was conducted by a qualified third-party and approved by the local Environmental Protection Agency. The assessment concluded that there are no sensitive biodiversity areas within the Entity's Area of Influence. The Entity's environmental risk level is considered low due to its location in a Government-planned industrial zone that is already equipped with an established Environmental Management System. Information pertaining to the Biodiversity, Ecosystem Services and Alien Species risk assessments is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3825
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified have been assessed and documented as low according to the approved Environmental Impact Assessment (EIA) report by the local Environment Protection Agency. Furthermore, no Priority Ecosystem Services were 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 no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has implemented a management policy and procedures to mitigate the risk of invasive species introduction. It has evaluated potential risks linked to its operations and logistics activities and assessed their impact on Biodiversity and Ecosystem Services. The Biodiversity assessment indicates that the Entity's activities present a low risk of introducing Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's management manual includes a commitment not to explore or develop New Projects or implement Major Changes within World Heritage Properties. Additionally, there are no World Heritage Properties within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity's management procedure includes a commitment to protecting the environment. According to the Environmental Impact Assessment (EIA) report, which has been approved by the local Environmental Protection Agency, 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.

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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 Entity commits to respect Human Rights and has established and implemented a Human Rights Due Diligence process. The Entity maps the Affected Populations and Organisations, and identifies, prevents, mitigates and accounts for how it addresses its actual and potential impacts on Human Rights. There are no reported issues on Human Rights associated with the Entity. The Policies and the Due Diligence process are reviewed in the annual management review meeting. The Entity's ESG Policy is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3813
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has a Policy commitment to gender equity and women's empowerment. The Entity implements protection measures to ensure respect of women rights and promote gender equity and women's empowerment. Women Workers interviewed during the Audit confirmed equal treatment and pay. The protection measures are reviewed periodically or when needed. The effectiveness of measures taken to promote gender equity is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3828
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'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 within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	In consultation with the relevant Government agency, it was determined that there are no cultural or sacred heritage sites or values present within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	The Criterion is not applicable to the Entity, as the presence of Indigenous Peoples or their lands, territories and resources is not identified within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity is located within an industrial zone in which the local Government is responsible for the construction and management of infrastructure. There has been no displacement caused by the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is located within an industrial zone and is surrounded by other factories and one resident community. Based on the result of risk assessment, environmental issues have potential to cause adverse impact on the Local Community. The Entity compiles the

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		Emergency Response Plan to address potential environmental incidents in consultation with the identified Affected Populations and Organisations. Following relevant legal requirements, the Emergency Response Plan is reviewed and revised as required every three years. The Emergency Response Plan for the environment incidents is disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3836
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established a Policy commitment to not use conflict minerals, and has established and implemented a Management System, including supply chain mapping, risk assessment, control plan, Due Diligence audits and reporting. The Entity provides training to all relevant employees, and the Policy and other requirements are communicated to suppliers. Suppliers return a commitment letter to not using conflict minerals.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has mapped the supply chain, and the sources of materials are clearly identified and assessed. No material is sourced from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity follows the OECD Guidance to determine how to respond to risks. Per the existing risk assessment report, no materials are from CAHRAs, with no 'red flags' in the supply chain. The Entity maintains an ongoing business relationship with its material suppliers.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Conflict-Affected and High-Risk Areas is one of the topics of supplier Due Diligence audit. All material suppliers are audited against the ASI Performance Standards. This ASI Audit also meets the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Entity has a mechanism to disclose its performance related to the ASI Performance Standard requirements including CAHRAs. The Entity has publicly disclosed its Responsible Aluminium Sourcing Due Diligence Policy: http://www.shalfoil.com/NewsDetail.aspx?ID=3817 However, the Entity has not reported on its supply chain Due Diligence performance for 2024.
9.9 Security practice	Conformance	Security guards are employed by the Entity. No body searches are permitted, nor are conducted. Training is provided to security guards and they are required to work in humane ways and respect the rights of Workers. No grievance or complaint against security activities has been received to date.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Freedom of Association and right to Collective Bargaining in accordance with local laws in China. The Entity has implemented a Policy addressing the right to Freedom of Association and Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining –	Conformance	The Entity has demonstrated they respect the right to Freedom of Association and Collective Bargaining. There is a Trade Union on site and Worker representatives are freely elected by the Workers, with a

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Alternative means in context of Applicable Law		total of 49 Worker representatives, including 16 women. The Trade Union/Worker representatives regularly hold meetings with management to discuss issues relating to Workers' rights and OH&S.
10.2a-c Child Labour	Conformance	There is no evidence of Child Labour, nor young Workers at the Entity. The youngest Worker at the site was born in January 2004 and joined the Entity in February 2023.
10.3a-c Forced Labour	Conformance	<p>The Entity commits itself, and expects its suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking. Workers are not required to provide any form of deposit, recruitment fee or equipment fee in advance. The Entity does not provide loans to Workers. There are no restrictions on the movement of Workers. The Entity does not retain Workers' original documents; only copies are kept in Workers' personnel files. The notice period for termination of employment complies with the Labour Contract Law: 30 days in advance or three days during the period of probation.</p> <p>The Entity has publicly disclosed an annual Modern Slavery Statement at: http://www.shalfoil.com/NewsDetail.aspx?ID=3816</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and it is clearly defined that any form of Discrimination is banned. Decisions in hiring, employing (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. There have been no instances of Discrimination received or identified.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers representatives has been established. This communication is efficient, as evidenced by the Trade Union Committee meeting minutes and interviews with Workers and management.
10.6a-g Violence and Harassment	Conformance	<p>The Entity respects its employees, and inhumane action, Harassment, abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation is prohibited. With the participation of Workers, the Entity has identified and assessed the risk of Violence and Harassment and taken measures to prevent or control any risks identified. The Entity's ASI Policy addresses the prohibition of Violence and Harassment. The Policy is reviewed in the annual management review meeting. The ASI Policy is publicly disclosed at: http://www.shalfoil.com/NewsDetail.aspx?ID=3813</p>
10.7a-c Remuneration	Conformance	All Workers sign an employment contract in Chinese with the Entity, and the terms and conditions of employment are clearly defined and meet the applicable legal requirement. The wage structure is clearly defined, with the basic wage not less than the legal minimum. The total payment meets the Workers' basic needs. Payslips are digitally provided to Workers privately through an application, which includes all necessary information. All payments to Workers are documented and made promptly via bank transfer without delay.
10.8a-c Working Time	Minor Non-Conformance	Working hours are recorded manually. Working hours are monitored to ensure that the total does not exceed 60 hours per week and/or 2,432

CRITERION	RATING	COMMENT
		<p>hours per year. The Entity has approval for implementing the 'comprehensive working hours' system.</p> <p>However, it was identified during the Audit that two out of 80 sampled Workers did not receive at least one day off in every seven days, with the maximum consecutive working days totalling 13.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights during the orientation process, through refresher training, and via the Employee Handbook.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has established, implemented, and maintains an Occupational Health and Safety Management System (OH&S) that adheres to ISO 45001:2018 Standard. Based from on-site observations, document reviews, and interviews with management and Workers, the OH&S system has been deemed effective in preventing workplace hazards, promoting a safe and healthy working environment, and complying with relevant regulations and standards.</p> <p>However, the Entity did not apply for the 'Construction Project Fire Safety Completion Acceptance Registration' for its Phase II workshop building project in a timely manner.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity employs a systematic approach to the review of its OH&S Management System. This process involves the execution of several key components, including monthly safety meetings, annual legal compliance checks, internal audits aligned with ISO 45001:2018 standards, and management reviews. The Entity's management team is responsible for the prompt identification of control gaps through these mechanisms and the implementation of corrective or preventive actions. The overarching objective of this process is to ensure the continuous enhancement of the Entity's OH&S Management System. To promote transparency, the Entity discloses its OH&S objectives, 2024 targets, and performance analyses to industry peers via its annual Health and Safety Management Performance Report, available at:</p> <p>http://www.shalfoil.com/NewsDetail.aspx?ID=3830</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management Committee to oversee workplace safety standards and drive continuous improvement in OH&S practices. Regular meetings are conducted to evaluate conditions and develop enhancement strategies. To promote employee engagement, the Entity has implemented communication channels including suggestion boxes and Worker representative assemblies, enabling employees to report concerns and collaboratively address OH&S issues for a safer, more inclusive work environment.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 August 2025	Initial Certification Audit – Full Certification