

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Jiangsu Huafeng Aluminum Industry Co., Ltd.

CERTIFICATE NUMBER
336

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
3 OCTOBER 2023

DATE OF EXPIRY
2 OCTOBER 2026

CERTIFIED SINCE
3 OCTOBER 2023

AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. Hu' or similar, with a long horizontal line extending to the right.

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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

Jiangsu Huafeng Aluminum
Industry Co., Ltd located in Zhoubo
Road, Economic Development
Zone, Pei Xian, Jiang Su, China, for
the manufacture of aluminium
plate strips and Aluminium foil
blanks.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Jiangsu Huafeng Aluminum Industry Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Huafeng Aluminum Industry Co., Ltd located in Zhoubo Road, Economic Development Zone, Pei Xian, Jiang Su, China, for the manufacture of Aluminium plate strips and Aluminium foil blanks.
SUPPLY CHAIN ACTIVITIES	• Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (7 – 8 September 2023) • Surveillance Audit and Scope Change (21 – 23 July 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 7 – 8 September 2023 (Initial Certification Audit) • 21 – 23 July 2025 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	• 26 September 2023 (Initial Certification Audit) • 31 July 2025 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (7 – 8 September 2023)</u> The Audit Scope covers the facility of Jiangsu Huafeng Aluminum Industry Co., Ltd. for the manufacture of Aluminium plate strips and Aluminium foil blanks. Supply chain activities included in the Audit Scope: • Casthouses • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit and Scope Change Audit (21 – 23 July 2025)</u> The Audit Scope covers the facility of Jiangsu Huafeng Aluminum Industry Co., Ltd. for the manufacture of Aluminium plate strips and Aluminium foil blanks. Supply chain activities included in the Audit Scope: • Casthouses • Semi-Fabrication • Material Conversion Relevant Criteria and Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.

AUDIT OUTCOME

- Certification
-

**AUDIT METHODOLOGY
DECLARATION**

The Auditors confirm that:

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

3 October 2023 – 2 October 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

2 October 2026

CERTIFICATE NUMBER

336



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

Jiangsu Huafeng Aluminum Industry Co., Ltd. (the 'Entity') was founded in January 2008 and is located in Peixian Economic Development Zone, Xuzhou, Jiangsu. It covers an area of approximately 105 hectares (ha) and has a registered capital of approximately 360 million Yuan. Its current annual production capacity is approximately 50,000 metric tonnes Aluminium sheet and strip and provides high-quality cast-rolled and hot-rolled Aluminium foil blanks of various alloys, thicknesses, and widths. Its primary clients are Aluminium foil production enterprises both domestically and internationally.

The Entity is a subsidiary of Jiangsu Zhongji Composite Materials Co., Ltd., which is a leading domestic enterprise producing high-precision Aluminium foil. Jiangsu Zhongji is a wholly owned holding enterprise of Wanshun New Materials, a national high-tech enterprise that was established in 1998 and is headquartered in the Shantou Free Trade Zone, Guangdong Province.

The Entity utilises modern production equipment, including a 2,000mm wide six-roll cold rolling mill, four inclined casting and rolling mills equipped with automatic thickness and plate shape control systems, as well as precision equipment such as annealing furnaces and re-coilers, oil mist recovery, dust removal and environmental protection equipment. It has adopted an advanced Mitsui online degassing plate filtration device from Japan.

The Entity holds ISO9001, ISO14001, ISO45001, and IATF16949 Management System certifications.

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 Entity has developed and implemented Policies, systems, procedures, and processes to comply with relevant legal requirements. The Entity's legal compliance department is responsible for the implementation of Applicable Law, regulations and other requirements within the organisation and conducts a legal compliance review yearly. The Entity has fully identified Applicable Laws, regulations, and other requirements, including customer requirements. There are no significant non-compliance issues within the Entity. Information regarding compliance performance is disclosed in the 2024 Sustainability Report, available at: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
1.2 Anti-Corruption	Conformance	The Entity has established and implemented a Policy and associated procedures to prevent Corruption, including a 'whistleblowing' mechanism which includes a suggestion box, hotline: 0516-67863387 and email 2135288523@qq.com. The 'whistleblowing' channel is communicated to both Workers and interested parties. Anti-Corruption training courses are provided to the Workers in high-risk positions. The anti-Corruption Policy is communicated to all suppliers, and suppliers must sign commitment letters.
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 measures, including training and communication to raise awareness on the Code amongst 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 available at: http://jiangsuhuafeng.com/upload/202308/24/202308241822041148.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity implements management Policies that are consistent with ESG practices. The Entity's senior management has demonstrated a commitment to these implemented Policies. Policies are reviewed at the annual management review meeting and/or when there is a Major Change or control gap. The Entity's Policies are accessible for both internal and external Stakeholders at: http://jiangsuhuafeng.com/upload/202507/23/202507231010198976.pdf
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard including leading the communication of the ASI-related requirements, Policies by training and on-site communication.

CRITERION	RATING	COMMENT
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 Certification. The latest external audit undertaken was in May 2025, with no non-conformances identified.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. The main social and Occupational Health and Safety (OH&S) impacts are identified and assessed and associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that address Responsible Sourcing. The Entity conducts second party Due Diligence audits of major 'next tier' suppliers' sites to qualify them. The Entity's procurement team and relevant personnel are trained annually on Responsible Sourcing requirements. The Responsible Purchasing Policy is reviewed in the annual management review meeting and is reviewed if there is a Major Change or control gap. The Responsible Purchasing Policy is available at: http://jiangsuhuafeng.com/upload/202309/07/202309071147200039.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 over the previous three years, and no such changes are proposed in the near future.
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 over the previous three years, and no such changes are proposed in the near future.
2.7a-f Emergency Response Plan	Conformance	The Entity has established a Comprehensive Emergency Response Plan, a Special Emergency Plan and Environmental Emergency Plans. These Plans are registered with the relevant government agencies. The Entity provides the relevant training courses to employees and conducts regular drills. The Emergency Response Plans are reviewed and reviewed every three years or when there is a Major Change or control gap and resubmitted to the authorities for registration. The Emergency Response Plans are available at: http://jiangsuhuafeng.com/upload/202507/21/202507211354137412.pdf and http://jiangsuhuafeng.com/upload/202308/24/202308241842516924.pdf
2.8a-d Suspended Operations	Conformance	The Entity has developed a procedure titled 'Provisions on Decision-Making and Administration of Critical Business Matters' to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The Entity complies with Applicable Law, follow internal Policies on layoffs and consults employee organisations. The suspension process and management procedure is reviewed in case of Material environmental, social and governance risk(s) caused by Business changes, or any indication of a control gap and shall be reviewed annually. No suspended activities have occurred in the previous three years.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure for Mergers and Acquisitions (Investment and Construction Projects Management Procedure). Senior management will conduct Due Diligence processes for Mergers and Acquisitions when they occur, and review its environmental, social and governance practices related to ASI Performance Standard, including those associated with Historic Aluminium Operations. No such activities have occurred at the Entity in the previous three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for Closure, Decommissioning and Divestment (Provisions on Decision-making and Administration of Critical Business Matters). Senior management commits to review environmental, social and governance practices for the planning process for closure, decommissioning and divestment, and will develop a plan for monitoring Material environmental, social and governance impacts. No such activities have occurred at the Entity in the previous three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social, and economic impacts in its 2024 Sustainability Report, available at: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
3.2 Non-compliance and Liabilities	Conformance	There were no monetary fines, judgments, penalties and non-monetary sanctions for failure received during 2024. This was verified with management interviews and the official websites of relevant government agencies and Non-Government Organisations (NGOs). This information is disclosed in the 2024 Sustainability Report, page 7: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
3.3a-c Payments to Governments	Conformance	In accordance with the Entity's Internal Control procedure, payments to Governments are only made on a legal basis. In China, no payments are made to political parties. Payment to Governments are legally required and includes social security fees and taxes, and are reported in the 2024 Sustainability Report at, page 7: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	In the Entity's Complaints Resolution Policy, the reporting of misbehaviour is encouraged, and the privacy of the whistle-blower is guaranteed. The hotline and email address for reporting are published via the Emergency Preparation and Response Plan. The hotline and email address are published at: http://jiangsuhuafeng.com/upload/202308/24/202308241837177725.pdf The Complaints Resolution Mechanism is disclosed at: http://jiangsuhuafeng.com/upload/202507/21/202507211427236188.pdf
4. MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has assessed the environmental impacts of its main Product line, Aluminium plate strip, using its own established methods. The environmental Life Cycle Assessment (LCA) of the Entity follows the 'cradle-to-gate' approach and includes the disposal process of production waste. The Entity has publicly disclosed its LCA Report, which can be accessed at: http://jiangsuhuafeng.com/upload/202507/23/202507231535214439.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The environmental impact LCA Report provides information on the Aluminium plate strip products from 'cradle to gate'. The Entity commits to providing further data and information regarding the lifecycle of its products upon request from customers. The environmental LCA Report of the Entity includes some basic LCA information and assumptions. The LCA Report can be accessed at: http://jiangsuhuafeng.com/upload/202507/23/202507231535214439.pdf It was identified in the Audit, there was incomplete information in the disclosed LCA Report.
4.2 Product Design	Conformance	The Entity itself does not engage in any product design activities. However, the Entity incorporates relevant sustainability goals into its production process control and raw material procurement processes to enhance the sustainability of its Products, including the environmental life cycle impact of the final products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established procedures for Aluminium Scrap recycling, with a target of 100% collection and recycling of process Scrap. The Entity has implemented various technical and management measures to reduce the generation of Aluminium Process Scrap in its operations and ensures the achievement of the 100% recycling target.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has engaged in communication and collaboration with downstream customers on how best to improve the recycling rate of products at 'end-of-life'. In addition, the Entity actively participates in public seminars on post-consumer Aluminium Scrap recycling and commits to demonstrate initiative in public welfare projects to promote the recycling of post-consumer Aluminium Scrap.
4.4d Collection and Recycling of Products at End of Life	Conformance	As there is no complete local, regional or national collection and recycling systems for Aluminium Scrap in China, the Entity has partnered with recycling facilities to commit to maximum recycling quality. The Entity has engaged in communication and collaboration with downstream customers on how best to improve the recycling rate of products at 'end-of-life' it has engaged in communication and collaboration with downstream customers on how to improve the recycling rate of products at end-of-life. In addition, the Entity actively participates in public seminars on post-consumer Aluminium Scrap recycling and commits to demonstrate initiative in public welfare projects to promote the recycling of post-consumer Aluminium Scrap. The Entity's Procurement Department continues to engage with recycling vendors on how to improve the recycling rate.

5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	In accordance with ISO 14064 Standard, the Entity has prepared an inventory of its Greenhouse Gas (GHG) emissions at the organisational level and has engaged a third party to verify the relevant emissions data. GHG and energy data are publicly disclosed in the Verification Report at: http://jiangsuhuafeng.com/upload/202507/21/202507211735006271.pdf Based on the 2024 report, the Entity has included Scope 3 and Scope 4 indirect emissions in their calculations and reporting scope.
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 applied the ASI-endorsed methodology and incorporated the ASI 1.5°C scenario emissions reduction tool to develop its medium- and long-term GHG reduction plan. This approach ensures that the Entity's GHG reduction pathway aligns with the global 1.5°C temperature scenario requirement.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	The Entity has prepared a GHG inventory using 2024 as the baseline year and has developed a 2025-2029 reduction plan aligned with the ASI 1.5°C Emissions Reduction Pathway calculation tool, for Scope 1, Scope 2 and Scope 3 (Category 1) emissions. To meet these targets, the Entity has implemented measures such as improving energy efficiency, optimising processes, and sourcing 'low carbon footprint (CPF)' raw materials. The GHG Emissions Reduction Plan and Pathways is publicly disclosed at: http://jiangsuhuafeng.com/upload/202507/28/202507281711252153.pdf It outlines its strategies and targets, while the Annual Sustainability Report (page 13) provides updates on 2024 progress and performance. The Entity commits to annual reviews and public updates to ensure transparency and accountability. The disclosed plans however lack clarity on how the Entity will achieve the reduction targets.
5.4 GHG Emissions Management	Conformance	The Entity compiles the GHG Emissions Reduction Plan to define the management approaches on GHG emissions, with the focus on energy management. During the Audit, site observations, document review and interviews, the Entity manages energy consumption, monitors the Management System performance to implement and achieve the GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity's main sources of air pollution are Volatile Organic Compounds (VOCs) and nitrogen oxides (NOx) emissions. The Entity has developed a plan to reduce these pollutants and has put in place an Air Emissions Management Program that involves regular

CRITERION	RATING	COMMENT
		maintenance of air pollution control facilities and frequent checks of exhaust emissions. The Entity updates its air emissions management plan whenever there are serious risks related to air pollution emissions and reviews the reduction plan regularly. Annual reports on air pollutant monitoring show compliance with regulatory requirements. The Entity's plan to reduce air pollutants and its annual air pollution emissions are available at: http://jiangsuhuafeng.com/upload/202507/23/202507231131342302.pdf
6.2a-g Discharges to Water	Conformance	The Entity only undertakes Aluminium casting rolling and sheet rolling processes, which do not produce any process wastewater during manufacturing. The Entity's use of domestic water has a very low impact on water resources and the environment. The Entity has set a goal to decrease wastewater usage by five percent annually. The Entity commits to regularly reviewing the relevant water pollutant management plan and addressing any control deficiencies that may occur. The Entity's water risk assessment report includes water pollutant emissions and a wastewater reduction plan is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231014513121.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has a procedure for assessing and managing the risks of leaks and seepage of pollutants and prepares appropriate emergency response actions and plans. The risk identification and emergency response plans are available at: http://jiangsuhuafeng.com/upload/202308/24/202308241835203477.pdf and http://jiangsuhuafeng.com/upload/202308/24/202308241842516924.pdf The Entity performs regular checks to detect any possible sources of leaks and seepage. The Entity also updates and improves the relevant emergency response and leak or seepage prevention management plans whenever there are any changes in the Entity that may affect the significant risks associated with leaks and seepage, as well as when there are signs of weaknesses in existing operational controls.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and Leakages is defined in the Entity's Environment Protection Management Procedure and Emergency Response Plan for Environmental Emergencies. The Entity is required to report the accident to the local Government agency and the affected parties. No Spills or Leakages have occurred in the past two years. The latest version of the Spills and Leakages Risk Assessment Report and Emergency Response Plans are disclosed at: http://jiangsuhuafeng.com/upload/202308/24/202308241835203477.pdf and http://jiangsuhuafeng.com/upload/202308/24/202308241842516924.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates the Material impacts by reusing and recycling wastes. The disposal of Hazardous Waste is undertaken in compliance with applicable legal requirements. The Entity publicly discloses the quantity of Hazardous

CRITERION	RATING	COMMENT
		and Non-Hazardous Waste generated in 2024 at: http://jiangsuhuafeng.com/upload/202507/17/202507171648581334.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.
6.8a-d Dross	Conformance	Dross is categorised as Hazardous Waste in China, and the Entity adheres to applicable legal requirements to collect, label and store Dross. No Leakage has been observed or reported. The Entity transfers all Dross generated to the disposal suppliers which are licensed by the environment protection authorities and reports the transfer information to the authorities. The Entity reviews the disposal processes at suppliers' sites. The Entity does not landfill Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has measured and documented its water intake and usage based on the source and type of water in the environmental impact and water resource risk assessments. The Entity has evaluated the water-related risks, considering the water environment, water intake and discharge, and the effectiveness of existing management measures. The Entity's water resource risk is considered low, and there are no significant water-related risks within the Entity's Area of Influence. The Entity has also prepared a water risk assessment report which is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231014513121.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material water-related risks in the Entity's Area of Influence. The existing management measures are included in the Water-related risks assessment report which is available at: http://www.jiangsuhuafeng.com/upload/202308/24/202308241834381799.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A qualified third party has conducted an Environmental Impact Assessment (EIA) that includes the evaluation of Biodiversity and Ecosystem Services risks and impacts. The local environmental protection agency has approved this EIA report. According to the Report and the Biodiversity risk assessment outcomes, the Entity's Area of Influence does not include any areas that are of biodiversity significance. The Entity is situated within a Government-planned industrial zone, and the risk is considered low.
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 for Biodiversity and Ecosystem Services are assessed as low per the Environmental Impact Assessment Report approved by the local environment protection agency. No Priority Ecosystem Services are identified.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts identified for Biodiversity and Ecosystem Services are assessed as low.
8.4 Alien Species	Conformance	The Entity has identified the risks of the introduction of Alien Species in its operation and logistical activities and assesses if the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The risk has been assessed as low.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has established a Management Manual that includes a commitment to not explore or develop New Projects or make Major Changes in World Heritage Properties. There are no World Heritage Properties in the Entity’s Area of Influence.
8.6a-d Protected Areas	Conformance	There are no Protected Areas within the Member’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 Entity has implemented a Policy with the commitment to respect Human Rights including Gender Equity and has communicated it to all employees. The Entity’s Policy on Human Rights is included in the ASI Social/Environmental/Safety Management Policy and is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231010198976.pdf The Entity has established and implemented a Human Rights Due Diligence process and maps the Affected Populations and Organisations. The risks to Human Rights are identified and assessed, and the major risks identified are in the supply chain. The Entity’s Supplier Code of Conduct is communicated to major suppliers. The associated mitigation and control measures are established and implemented, such as audits for major suppliers. The supplier audit reports show no adverse cases reported. No negative information has been identified online regarding Human Rights issues related to the Entity and its major suppliers. The Human Rights Due Diligence process is reviewed in the annual management review meeting. The Entity’s Human Rights Risk Assessment Report indicates that its impact on the Human Rights of populations and organisations within its Area of Influence is minimal. The Assessment Report via: http://jiangsuhuafeng.com/upload/202507/23/202507231010198976.pdf
9.2a-e Gender Equity and Women’s Empowerment	Conformance	The Entity has implemented Policies to respect the rights of women and has implemented a program to promote Gender Equity and Women’s Empowerment across the entire employment framework. No

CRITERION	RATING	COMMENT
		complaints have been received from women Workers. Women Workers interviewed during the Audit stated that they know their rights and no negative feedback was received. The Entity assesses the program on Gender Equity and Women's Empowerment. A Report outlining the Entity's Gender Equality programs is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231000181021.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples where the Entity operates. However, the Entity has established and implemented Policies and processes to ensure respect for the Rights and interests of Indigenous Peoples.
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 where the Entity operates. However, the Entity has developed a Stakeholder engagement and communication process specifically designed to address the impacts on Indigenous Peoples for all New Projects and significant modifications to existing projects. Within this process, the Entity is dedicated to engaging in meaningful consultation and cooperation with the Indigenous Peoples involved, respecting their representative institutions, and seeking their Free, Prior, and Informed Consent (FPIC).
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 where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established a process to identify and assess the cultural and sacred heritage sites, aiming to minimise any potential impact on these sites. Currently, all new and existing projects of the Entity have undergone Environmental Impact Assessments (EIA) and social assessments. Through these assessments, it has been determined that there are no sacred or cultural heritage sites within the Area of Influence of the Entity.
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, and as confirmed by the Entity's environment and social assessment report, there are no sacred, cultural or heritage sites in the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has implemented a Policy to address the resettlement within the framework of legal requirements. In China, any resettlement is managed by the Government. There has been no resettlement required throughout the operational history of the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Policy to commit to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity has established and implemented compliance management and risk control procedures to identify, prevent, monitor and mitigate any significant impacts caused by its activities, including those related to

CRITERION	RATING	COMMENT
		Health and Safety, social and cultural Human Rights and environmental impacts. The Entity works closely with the Industrial Estate Management Committee and, through its Stakeholder engagement process, consults and involves Affected Populations and Organisations in the development of its management plans, including the formulation of the Safety Contingency Plan and the Environmental Contingency Plan. Additionally, the Entity actively participates in support of the Local Community such as visiting elderly people during the festival period. The identified Affected Populations and Organisations and the management plan is available at: http://jiangsuhuafeng.com/upload/202507/23/202507230959099523.pdf
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has implemented a Policy to not using conflict minerals and establishes and implant the Management System, including supply chain mapping, risk assessment, control plan, Due Diligence audits and reporting. The Entity provides the training to all relevant employees, the Policy and requirements are communicated to suppliers, and all the suppliers sign the Commitment Letter of not using conflict minerals to confirm their commitment.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts a supply chain risk assessment to determine if any materials are from Conflict-Affected and High-Risk Areas (CAHRAs) based on the information gathered through communications with suppliers. The risk assessment report states that there are no materials sourced from CAHRAs, with all suppliers from China.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity conducts a supply chain risk assessment to determine if any materials are from CAHRAs based on the information gathered through communications with suppliers. The risk assessment report states that there are no materials sourced from CAHRAs, with all suppliers from China.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This Audit satisfies the requirements of this Criterion of the Performance Standard.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity defines that the performance of supply chain Due Diligence on CAHRAs shall be publicly reported. The details and results of supply chain Due Diligence on CAHRAs for 2024 are disclosed in the 2024 Sustainability Report: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
9.9 Security practice	Conformance	All security guards are employed by the Jiangsu Hongdun Security Services Co., Ltd. Strict Policies are in place to ensure that no body searches are permitted, and security guards are expected to undertake their duties in a humane manner. Comprehensive training is provided to all security guards to ensure they understand their responsibilities and the importance of respecting Human Rights. It is worth noting that no grievances or complaints have been received to date.

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
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 Applicable Law in China and respects the Workers' rights 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	There are laws that restrict Freedom of Association and Collective Bargaining in China, however, the Entity demonstrates they respect the right to Freedom of Association and to Collective Bargaining; Workers' representatives can discuss any Worker concerns with the Entity's management.
10.2a Child Labour	Conformance	Site observations and interviews with the sampled Workers undertaken during the Audit indicated that the youngest Worker is 23 years old. No Child Labour was identified. In China, the minimum working age is 16 and the Entity has established a Policy of not using Child Labour. The age of candidates is verified by checking the ID cards and through interviews. Copies of ID cards of Workers are kept in the personal files as evidence of age verification.
10.3a-c Forced Labour	Conformance	The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, Modern Slavery and Human Trafficking. The Entity neither engages in nor supports the use of Forced Labour, nor supports Human Trafficking. Workers are hired directly by the Entity, do not pay any recruitment fees and no deposit is required. No loans are provided to Workers. There is no unreasonable restriction on movement. Workers can freely terminate their employment with prior notice. The Entity's 2025 Modern Slavery Statement is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231024435817.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination. The Entity's recruitment advertisement and training plan indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than on other personal characteristics, including equal pay for the same work undertaken. This was verified through Worker interviews who confirm they are treated equally. No case of Discrimination has been received.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication with Workers and Worker representatives. Communication channels are provided to Workers where they can make complaints and raise concerns regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity respects its Workers at all times and disciplinary measures are in compliance with legal requirements and require the confirmation of the involved Worker. The Entity does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers. The Policy on Violence and Harassment is included in the ASI Social/Environmental/Safety Management Policy and is available at: http://jiangsuhuafeng.com/upload/202507/23/202507231010198976.pdf

CRITERION	RATING	COMMENT
10.7a-c Remuneration	Conformance	The Entity's wage structure is clearly defined, and the basic wage meets the legal minimum wage. The total payment meets the Workers' basic needs. All payments are documented and paid in a timely manner to all Workers by bank transfer around 15 th of the following month.
10.8a-c Working Time	Minor Non-Conformance	Working hours are recorded manually. For most Workers in the workshops, there are three groups for two shifts. Working time is organised into two shifts are 08:00-20:00 and 20:00-08:00. Workers work four days in a row and then have two days' rest. Shifts are switched every two days. For other Workers and office staff, the Working Time is from 08:00 to 12:00 and 13:00-17:00. The regular Working Time is eight hours a day and 40 hours a week. A management procedure for working hours and Overtime work has been established to control Overtime. At least one day off each week is guaranteed. The average workday does not exceed eight hours over a six-month period. It was noted, however, that approximately five percent of Workers had worked an excess of Overtime hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs its Workers of their rights and has established cooperation and communication with the Workers at all its production plants via several channels including the Employee Handbook, intranet and notice boards.
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 (OH&S) Management System that is continually improved and is certified to ISO 45001:2018. During the Audit, on-site observations, document reviews, and interviews with management and Workers determined that the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically evaluates its OH&S Management System through various methods. These include monthly safety meetings, an annual assessment of legal compliance, an annual internal audit based on ISO 45001:2018, and management review meetings. If any sign of a control gap emerges during these evaluations, a comprehensive analysis is undertaken to determine the need for potential corrective and/or preventive actions. This proactive approach ensures that any issues or gaps in the OH&S Management System are promptly resolved. To foster transparency and communicate performance information, the Entity publishes its OH&S objectives and targets for 2024, as well as comparative analyses of performance with peer businesses and leading practices, which are available in the 2024 Sustainability Report, pages 9 to 12: http://jiangsuhuafeng.com/upload/202507/28/202507281708571496.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a system of Workers' consultation and participation in Health and Safety management. Workers are encouraged to report their concerns or advice on OH&S issues to Management Representatives. The Entity's management then responds to the concerns and advice on OH&S issues from Workers.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 October 2023	Initial Certification Audit – Full Certification
1	20 September 2025	Surveillance Audit and Scope Change to add ‘Semi-Fabrication’ Supply Chain Activity
