

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.

CERTIFICATE NUMBER
133

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**TÜV RHEINLAND CERT
GmbH**

DATE OF ISSUE
7 JULY 2024

DATE OF EXPIRY
6 JULY 2027

CERTIFIED SINCE
7 JULY 2021

AUTHORISED BY

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

Aluminium re-melting, refining and
semi-fabrication activities
associated with the manufacture
of Aluminium foils, plates, sheets
and strips.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.
ENTITY NAME	CHINALCO ALUMINUM FOIL (YUNNAN) CO., LTD.
CERTIFICATION SCOPE	Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foils, plates, sheets and strips.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (23 – 25 March 2021)Surveillance Audit (13 – 15 February 2023)Re-Certification Audit and Scope Change (22 – 24 July 2024)Surveillance Audit (13 – 14 January 2026)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">23 – 25 March 2021 (Initial Certification Audit)13 – 15 February 2023 (Surveillance Audit)22 – 24 July 2024 (Re-Certification Audit and Scope Change)13 – 14 January 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">23 April 2021 (Initial Certification Audit)23 April 2023 (Surveillance Audit)19 September 2024 (Re-Certification Audit and Scope Change)26 January 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 25 March 2021)</u></p> <p>The Audit Scope included the Aluminium re-melting, refining and semi-fabrication associated with the manufacture of Aluminium foil at the Yunnan Haoxin Aluminum Foil plant, excluding the new expansion project (35,000 tonne battery Aluminium foil) which is not yet operational.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (13 – 15 February 2023)</u></p>

The Audit Scope included the production of the Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foil and plate at the whole Entity excluding the new expansion project (35,000 tonne battery Aluminium foil) which is not yet operational.

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (22 – 24 July 2024)

The Audit Scope included Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foil and plate, excluding the new expansion project (35,000 tonne battery aluminium foil) which is not yet operational.

Supply chain activities included in the Audit Scope:

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

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

Surveillance Audit (13 – 14 January 2026)

The Audit Scope included Aluminium re-melting, refining and semi-fabrication activities associated with the manufacture of Aluminium foil and plate, including the new expansion project (35,000 tonne battery aluminium foil), which is now operational.

Supply chain activities included in the Audit Scope:

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

All applicable Criteria in the ASI Performance Standard 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 company's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

7 July 2024 – 6 July 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

6 July 2027

CERTIFICATE NUMBER

133



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

CHINALCO ALUMINIUM FOIL (YUNNAN) CO., LTD. (the 'Entity'), established in March 1996, is located at Yangzonghai, Kunming City, Yunnan Province, China and covers a total area of 280,000 square meters. The Entity is a wholly owned subsidiary of CHINALCO Aluminum Group that specialises in the processing, sales, and production technology research and development of Aluminium foil and plate. The main products include single and double zero Aluminium foil blanks, Aluminium decorative strips, cathode plates, electronics, power capacitor foils, sterile packaging foils, tobacco foils, pharmaceutical foils, battery foils, and insulation material foils. The products are destined for the domestic market and exported to Southeast Asia, South Asia, Europe, the United States of America and other countries.

The Entity's main production processes include casting, extrusion and machining, with a designed production capacity of 350,000 tonnes per year. There are seven workshops and one office building, including 17 casting and rolling mills, three cold rolling mills, and 10 Aluminium foil rolling mills. The Entity is equipped with a reuse water treatment station, air compression station, hazardous waste warehouse, and general solid waste warehouse.

The Entity currently employs over 800 employees, and its main Stakeholders include shareholders, customers, partners, upstream supply chains, and government-related departments (such as the tax authorities). The Entity's continuous development plan provides employment opportunities for nearby residents, and drives the economic development of the surrounding areas.

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	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has an established procedure to identify Applicable Laws and regulations. The Legal, EHS and Human Resources Departments are responsible for the identification of and, at minimum, annual assessment of its Compliance with Applicable Law, which covers the areas of labour, ethics, Health and Safety and the environment.
1.2 Anti-Corruption	Conformance	The Entity has implemented a Business Ethics Policy, which addresses anti-extortion and Bribery, and training is provided to employees. The Entity has established a Code of Conduct, which addresses Corruption, and is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html Details of the ethics reporting channel is posted in the meeting room and canteens. A Due Diligence investigation on the high-risk positions in the Entity, such as in the purchasing, sales, quality, and warehouse departments, was undertaken and staff in these departments are required to sign an Honesty Commitment Letter. Internal audits on ethics are conducted at least every six months.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct and provides training to Workers periodically. The Code of Conduct is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html The Entity has communicated the Code of Conduct to their suppliers and requires them to sign a commitment letter.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained a series of Policies consistent with the relevant environmental, social, and governance practices. The Policies have been approved by the General Manager and supported through provision of resources. The Entity's Management System requires review of the Policies annually as part of the management review process. Additionally, any changes to the business that could affect environmental, social, or governance risks, or any indication of a control gap require a review of the Policy. The most recent review was conducted in December 2025. The Policies are communicated internally through orientation, training, and displays and externally via the website, available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140427.html
2.2a-c Leadership	Conformance	The Entity has nominated a Management Representative and the responsibility and authority of each department and key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented the Environmental Management System, certified against ISO 14001:2015 (valid until 31 May 2027). There have been no fines or requests for corrective actions from government agencies or other Stakeholders.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System and complies with legal requirements. An annual Compliance evaluation is conducted, with no fines or requests for corrective actions from government agencies and other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Sourcing Management Procedure and a Responsible Sourcing Policy that both aim to communicate the environmental, social, and governance aspects to the Entity's raw and auxiliary materials suppliers and contractors. The Entity has communicated these Policies to all suppliers and contractors through the ESG commitment letters. The Responsible Sourcing Policy is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140427.html
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. The Entity however has evaluated the environmental, social, cultural and Human Rights impacts as part of the Environmental Impact Assessments, as well as evaluating the effectiveness of occupational hazard controls during the Entity's initial construction.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, the Entity however has established a Human Rights Impact Assessment process and disclosed its performance on Human Rights in its Sustainability Report.
2.7a-f Emergency Response Plan	Conformance	The Entity has established Emergency Response Plans to address any potential for an Aluminium powder explosion or excessive discharge of domestic sewage and emissions. All employees are trained on the Emergency Plan, with regular drills undertaken. The Entity has submitted the Plan to the local Ecology and Environment Bureau and Emergency Management Centre. The Emergency Response Plan for Environmental Incidents is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240824_134261.html The Emergency Response Plan for Production Safety is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/t20260114_162457.html
2.8a-d Suspended Operations	Conformance	The Entity has established a management procedure for the Suspension of Operations, including a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, that considers Material adverse environmental, social and governance impacts. The Entity reviews its Business Resilience Plan every five years, and on any indication of a control gap or after any changes to the Business that alter the nature or scale of environmental, social and governance risks.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management control procedure for investments and acquisitions. Currently, there is no merger or acquisition activity proposed.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management control procedure for closure, decommissioning and divestment. No such event occurred in the past three years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has addressed its Material impacts and governance approach to environmental, social and economic topics, in the 2024 ESG Report, available at: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity provides information on non-compliance and liabilities in its 2024 Annual Report, page 97: https://www.chalco.com.cn/tzgx/yjbg/ndbg/202506/P020250609382725451093.pdf No fine or penalty was imposed by the government during 2024.
3.3a-c Payments to Governments	Conformance	The Entity only makes payments to the Government that are legally required. The Entity has disclosed the payments to governments in its Annual Report, pages 30-31: https://www.chalco.com.cn/tzgx/yjbg/ndbg/202506/P020250609382725451093.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the Stakeholder complaints, grievances and requests for information requirements. The Entity's Management System tracks requests and complaints from Stakeholders and has an appropriate resolution mechanism. The communication channels (telephone, email) are made public to internal and external Stakeholders and are included in the 2024 ESG Report, page 30: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has established a Greenhouse Gases (GHG) Inventory Procedure and has a Life Cycle Assessment (LCA) verification statement for one kilogram (1kg) Aluminium foil products. The statement contents include the environmental impact categories using the 'cradle-to-gate' approach.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted an LCA via a Third Party certification body that includes assessment against categories including abiotic depletion, acidification, eutrophication, global warming, ozone depletion, human toxicity, freshwater aquatic ecotoxicity, and others. The LCA is available upon customer request, and on the website at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/P020260112463634110685.pdf
4.2 Product Design	Conformance	The Entity has established the New Product Research and Development Procedure that requires the consideration of materials selection and utilization during the production development and process planning process. This procedure aims to ensure appropriate

CRITERION	RATING	COMMENT
		process selection, improved process efficiency, equipment and load optimization, process optimization, extended service life, convenient maintenance and cost-saving, as well as improving Scrap management and disposal.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a goal of achieving a 100% recycling rate for Aluminium Process Scrap generated during the production of Aluminium products and regularly evaluates its progress. The Entity has implemented a Scrap classification and management procedure to classify and dispose of the different types of Aluminium Scrap. All Scrap is classified and separated by alloy and disposed by different smelters.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has implemented the ESG Manual that defines that it must actively pursue improvements in the reuse rate of Aluminium. To facilitate these improvements, the Entity has established recycling agreements with customers and certified material dismantlers to facilitate the collection of End of Life Scrap.</p> <p>The Entity monitors the recycling content in its Products and has implemented a detailed program designed to enhance the reuse of Aluminium from Products at End of Life. This includes a comprehensive recycling strategy aligned with local, regional, and national collection and recycling systems, enabling accurate measurement and supporting targeted efforts to increase recycling rates across its markets.</p> <p>For general building materials, the Entity utilises recycled Aluminium sourced from post-consumer waste streams, and Aluminium recovered from discarded cable wires and automobile wheels. In 2025, the Entity used over 300 tonnes of post-consumer Recycled Aluminium in its Products, with a significant scale-up planned for 2026, targeting approximately 3,000 tonnes. Furthermore, the CHINALCO Group collaborates with the Micro-Product IoT (Recycling) Platform to strengthen traceability and support the efficient recycling of post-consumer metal materials.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has publicly disclosed Material Greenhouse Gas (GHG) emissions by source annually. Direct and Indirect (Scopes 1, 2 and 3) emissions data are included and have been independently verified. The Entity's GHG Emissions Inventory Report is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/P020260114469566626443.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and ensures a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario using the ASI Emissions Reduction Pathway Calculation Tool.</p> <p>The Entity's GHG reduction strategy is designed to reduce the emissions intensity of Scope 1 and 2 GHG emissions to 0.177 tonnes CO₂e/tonne and to 8 t CO₂e/t for Scope 3 Category 1 by 2028. The Entity reduced its emissions intensity in 2024 from a 2023 baseline, however it is not yet required under the Criterion to demonstrate that actual emissions reductions are aligned with its pathway.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario. The Entity has established Intermediate Targets including 'year on year' targets to 2028 for all Direct and Indirect GHG emissions.</p> <p>A mechanism has been implemented to review the GHG Emissions Reduction Plan and Pathway annually. The Entity has disclosed its GHG Emissions Reduction Plan and Pathway, available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/P020260114492111498607.pdf</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented the Energy Management System Manual and GHG Emissions Reduction Plan, which defines its management approaches on GHG emissions reductions, with a focus on energy management. Following the 'Plan-Do-Check-Action' approach, the Entity manages its energy consumption and monitors the Management System performance to determine progress against its GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has established an air emissions inventory for all emission sources for all outlets. Monitoring is undertaken by qualified Third Parties according to the monitoring plan in the Pollution Discharge Permit (PDP). The Entity is not a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for air emissions discharge. The Entity has established annual reduction targets for key pollutants including sulphur dioxide and non-methane hydrocarbons and targets are tracked and reviewed by the management team annually.</p> <p>The Entity has implemented improvement programs to reduce waste air emissions and achieve its targets. The Entity has also established emergency response programs for the waste air treatment system and all the exceedances are clearly recorded and treated.</p> <p>The Entity has quantified its annual Emissions to Air and disclosed its emissions reduction plan in the 2024 ESG Report, pages 43-44: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	<p>The Entity has established a wastewater emissions inventory for all wastewater emission sources. In accordance with the Entity's Pollution Discharge Permit (PDP), no industrial wastewater is generated. The Entity is not considered a key pollution discharge site in Kunming and has never been prosecuted by the local environment bureau for water discharge non-compliances.</p> <p>The Entity has established a continual reduction plan for domestic wastewater discharges and all improvement programs are tracked. Wastewater is treated onsite and reused in the equipment cooling process and for reticulation. There is zero discharge of wastewater.</p> <p>The Entity has disclosed its wastewater performance in the 2024 ESG Report, pages 45-46: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established and implemented an ISO 14001 Environmental Management System. According to the approved Environmental Impact Assessment, and in conformance with the requirements of the Environmental Management System, the Entity has identified and developed corresponding emergency measures and plans to address Spills and Leakages. The Entity's Emergency Plan for Environmental Incidents has been filed with the local environmental protection department, and is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/P020260112471194264863.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable as there have been no incidents of Spills or Leakages. However, the Environmental Impact Assessment Report assesses the potential impact of Material Spills and Leakages as soon as practicable after an incident.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Solid and Hazardous Waste management procedures have been established that define the collection and disposal of all Waste. Hazardous Waste is transferred to qualified third parties in accordance with legal requirements. Inventory and disposal receipts are kept for review. The Entity has established continual improvement targets to reduce generation of Waste and targets are reviewed annually by the senior management team. Hazardous Waste is appropriately labelled. The Entity has disclosed its Waste management performance in the 2024 ESG Report, pages 45-46: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.8a-d Dross	Conformance	<p>The Entity has established and implemented a Dross Classification and Management Procedure that defines the process for the collection and recycling of Aluminium Dross. Dross is systematically collected, clearly labelled, securely stored and transported exclusively to licensed waste management suppliers for treatment in full compliance with applicable hazardous waste regulations. To date, no leaks or incidents have been observed or reported. A licensed supplier</p>

CRITERION	RATING	COMMENT
		treats the Dross to maximise the recovery and recycling of Aluminium from the residues. Dross residues are never disposed to landfill.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and documented water withdrawal and use by source and type in the EIA. The Entity has assessed the water-related risks, which considered the surrounding water environment, water withdrawal and discharge, and the effectiveness of the existing management measures. The risk was identified as low, there are no Material water-related risks in the Entity's Area of Influence. The Assessment Report on Water-Related Risks is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/P020260112464671715393.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as there are no Material water-related risks in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Biodiversity and Ecosystem Services Risk and Impact Assessments are included in the Entity's Environmental Impact Assessment (EIA), conducted by qualified Third Parties approved by the local Environmental Protection Agency. As per the approved EIA reports, there are no Biodiversity-sensitive areas in the Entity's Area of Influence. The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The risks and potential impacts on Biodiversity and Ecosystem Services have been assessed as low. The Biodiversity Assessment Report for the Entity is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202408/t20240827_134362.html
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 have been assessed and documented as low. No Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts have been assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity has identified the risks of the introduction of Alien Species during operation and transportation activities and assessed whether the activities could have Material adverse impacts on Biodiversity and Ecosystem Services. The risk was identified as low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to not exploring or developing New Projects in World Heritage Properties. There are no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an Industrial Park with no Protected Areas present.

CRITERION	RATING	COMMENT
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	<p>The Entity has established a Code of Conduct to respect Human Rights, which is available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140428.html</p> <p>The Entity has established a procedure to conduct a Human Rights Due Diligence process. Implementation of the Human Rights Policy and relevant performance are reviewed. The Human Rights Impact Report and information on the affected Communities' engagement approach is publicly disclosed, available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140432.html</p> <p>The Entity has identified the Affected Populations and Organisations and complaints channels are public to all Stakeholders in the 2024 ESG Report, page 30: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p> <p>No adverse impact has been reported and no remedy is required.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established a commitment in its Code of Conduct to protect female Workers and respect and promote gender equity and women's empowerment. The Entity respects for the rights and interests of women and develops activities to support work-life balance, especially for women.</p> <p>The Entity has publicly disclosed information on the gender equity Policy and performance on the protection of female Workers: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140441.html</p> <p>Female Workers' remuneration is equivalent to male Workers, each department and management team have female Workers, and no Discrimination is noted. Relevant information is disclosed in the 2024 ESG Report, pages 72-77: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
9.3a-l Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as per the assessment report, there are no Indigenous Peoples within the Entity's Area of Influence. 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 per the assessment report, there are no Indigenous Peoples within the Entity's Area of Influence. Additionally, there have been no New Projects developed since 2020. However, the Entity has established and implemented Stakeholder engagement processes to manage communication with the Local Communities to obtain their major concerns on the impact of New Projects or existing operations on Local Communities.

CRITERION	RATING	COMMENT
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 and therefore Free, Prior and Informed Consent (FPIC) has not been required.
9.5a Cultural and Sacred Heritage-- Identification	Conformance	The Entity has established and implemented a procedure to identify cultural and sacred heritage and conduct risk assessments to reduce the impact on any sites. At present, all of the Entity's projects have undergone an EIA and social stability assessment, and it has been determined that there are no sacred or cultural heritage sites within the project's impact area.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites within the Entity's Area of Influence. However, the Entity has implemented a procedure to identify the cultural and sacred heritage and conduct risk assessments to reduce the impact on the sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Changes or New Projects causing resettlements in the history of the Entity. Additionally, there have been no New Projects since the Entity joined ASI in 2020.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has established and implemented a Stakeholder engagement process to identify the major concerns of Affected Populations and Organisations. The Entity has developed various plans to respond to the major concerns of the Affected Populations and Organisations. The implementation and progress of the plans are reviewed annually, relevant improvement actions are undertaken, and the Entity's actions and performance against the plans are publicly disclosed at:</p> <p>https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140432.html</p> <p>Additionally, various development activities to support the Local Community are detailed in the 2024 ESG Report:</p> <p>https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has established a Supplier Code of Conduct and through its Management System has committed to not using conflict minerals. Training has been provided for all relevant employees. The Entity's ASI Policy, including the Purchasing Policy and requirements are communicated to suppliers and made publicly available.</p> <p>The Supplier Code of Conduct is available at:</p> <p>https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140429.html</p> <p>The 2024 ESG Report is available at:</p> <p>https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has identified and assessed the risks in its supply chain through regular risk assessment and Due Diligence processes. No conflict minerals are used, no sourced materials are from Conflict-

CRITERION	RATING	COMMENT
		Affected and High-Risk Areas, and there are no critical Human Rights issues such as Child Labour and Forced Labour.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as per the risk assessment record, no conflict minerals are used, no materials are from Conflict-Affected and High-Risk Areas, and there are no critical Human Rights issues such as Child Labour and Forced Labour.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Performance Standard Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established and implemented a supplier Code of Conduct, performed a risk assessment and undertaken a social responsibility audit on its supply chain. The Entity commits that no conflict material will be used in its supply chain. There is no conflict minerals used, and no materials are from Conflict-Affected and High-Risk Areas. The Entity has disclosed its Policy and practices regarding conflict materials in its Non-use of Conflict Minerals Statement: https://zllb.chinalco.com.cn/xwzx/gsyw/202601/t20260114_162458.html
9.9 Security practice	Conformance	The security at the Entity is provided by the parent company (Yunnan Aluminum Co., Ltd). The Entity has established regulations to address the Code of Conduct of security personnel and ensure respect for Human Rights. There have been no violations of Human Rights.
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 they adhere to the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Labour Union, and all Workers are members. The Labour Union Constitution outlines the Union representatives' election process and member's rights.
10.2a-c Child Labour	Conformance	The Entity has established processes to ensure no Child Labour is employed. Document review, site observations and Worker interviews during the Audit confirmed that there is no Child Labour or young Workers at the Entity. The youngest Worker in the Entity was 20 years old.
10.3a-c Forced Labour	Conformance	The Entity has established a Policy on the prohibition of Forced Labour including Human Trafficking. The Entity commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking. No case of illegal wage deductions, Debt Bondage, payment for a debt or other type of Forced Labour has been identified nor reported in the Entity. The Entity has disclosed its Modern Slavery Statement, available at: https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140433.html
10.4a-c Non-Discrimination	Conformance	The Entity's ASI Management Manual and Non-Discrimination Management Procedure address the requirements on anti-Discrimination, including during hiring, promoting, and training

CRITERION	RATING	COMMENT
		<p>processes. The Entity has implemented adequate and effective processes to ensure there is no Discrimination, for example, no sensitive health check items such as pregnancy test is required upon hiring, women are employed from direct Workers to senior management team, Workers with disabilities are hired, no discriminatory conditions in recruitment advertisements, fair promotion program based on skill and capability, equal chance for Overtime work, and the same benefits are received for the same position. There have been no complaints on Discrimination received by the Entity. The Entity has disclosed its performance on gender equity at:</p> <p>https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140441.html</p>
10.5 Communication and engagement	Conformance	<p>The Entity encourages Workers to participate in the ASI Management System, and direct and frequent communication with Workers and the representatives of the Workers' Council is established. Interviewed Workers provided feedback on a positive working environment and direct communication.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented Policies stating that Harassment and bullying are not accepted. An information brochure has been developed and distributed to all employees. The Entity's ASI Policy is clear on this issue and regular training of employees is performed. The ASI Policy is available at:</p> <p>https://zllb.chinalco.com.cn/xwzx/gsyw/202412/t20241213_140427.html</p>
10.7a-d Remuneration	Conformance	<p>The Entity and Workers sign labour contracts within a month of commencing employment at the Entity. The terms and conditions of the labour contract meet the labour contract law. The wage structure is clearly defined; and the basic wage is not less than the legal minimum wage. The total payment meets the Workers' basic needs. Overtime is paid in accordance with the legal requirements of 150% of the regular wage for Overtime on working days, 200% for weekends, and 300% on public holidays. All the employees are enrolled in the social insurance and housing fund. Moreover, the Entity has provided supplemental retirement insurance to all Workers, which is leading practice in China. Wages are paid to Workers monthly, without delay.</p>
10.8a-c Working Time	Conformance	<p>Working hours at the Entity are recorded and tracked. The regular working hours are 8 hours a day, 5 days a week, with a total of 40 hours a week. Working hours are monitored and controlled, and do not exceed the legal limit. All Workers have one day off per seven-day period and the Workers' daily working hours do not exceed eight hours.</p> <p>The Entity has an established procedure on providing annual leave and other paid leave to Workers according to the legal requirements.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has informed employees of their rights during the signing of their employment contract, and contracts terms are detailed in the employee handbook and communicated to Workers through orientation training. The Entity's ASI Management Manual and social accountability procedure training, which is provided to all employees, addresses lawful Freedom of Association. The key information is also posted in workshops on billboards.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System, including a management manual and procedural documents (issued by CQC and valid to September 2028). The Management System is internally audited and reviewed annually. The Management System addresses the requirements for non-compliances, including analysis of the root cause and implementation of corrective and preventative actions. The latest external audit of the Entity's OH&S Management System identified no major non-conformances. As per site observation, document review and management and Worker interviews, the OH&S Management System is effective.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	<p>The Entity has regularly reviewed the OH&S Management System, including during monthly safety meetings, annual legal compliance evaluations, annual internal audits against ISO 45001:2018, and the management review meeting. When any indication of a control gap is shown, the review is conducted to assess if the potential corrective and/or preventive actions should be implemented.</p> <p>The achievement of OH&S objectives and targets and the comparative analyses of performance with peer businesses and leading practice are detailed in the 2024 ESG Report, pages 67-70: https://www.chalco.com.cn/whzr/shzr/202506/P020250611386704309457.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a system of Workers' Consultation and participation in OH&S. The Workers are encouraged to report their concerns or advice on OH&S issues directly or via the Worker representatives, and management responds to concerns and advice raised.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 July 2021	Initial Certification Audit – Full Certification
1	16 May 2023	Surveillance Audit
2	14 January 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3. Update to Member and Entity Name following the company name change from Yunnan Haoxin Aluminum Foil Co., Ltd.
3	26 February 2026	Surveillance Audit