

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Kunshan Aluminium Co., Ltd.

CERTIFICATE NUMBER

74

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

26 FEBRUARY 2026

DATE OF EXPIRY

25 FEBRUARY 2029

CERTIFIED SINCE

26 FEBRUARY 2020

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
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[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

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

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

## CERTIFICATION SCOPE

Production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials at Kunshan Aluminium's facility located at Kunshan City, Jiangsu Province, China.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

|                         |   |
|-------------------------|---|
| MEMBER NAME             | Kunshan Aluminium Co., LTD.   |
| ENTITY NAME             | Kunshan Aluminium Co., LTD.   |
| CERTIFICATION SCOPE     | Production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials at Kunshan Aluminium's facility located at Kunshan City, Jiangsu Province, China.  |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>Semi-Fabrication</li></ul>  |
| ASI STANDARD            | Performance Standard V3.1   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>Initial Certification Audit (23 – 24 December 2019)</li><li>Surveillance Audit (10 – 11 August 2022)</li><li>Re-Certification Audit and Scope Change (5 June – 6 June 2023)</li><li>Surveillance Audit (18 – 19 February 2025)</li><li>Re-Certification Audit and Scope Change (27 January – 30 April 2026)</li></ul>   |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.   |
| AUDIT DATE              | <ul style="list-style-type: none"><li>23 – 24 December 2019 (Initial Certification Audit)</li><li>10 – 11 August 2022 (Surveillance Audit)</li><li>5 June – 6 June 2023 (Re-Certification Audit and Scope Change)</li><li>18 – 19 February 2025 (Surveillance Audit)</li></ul>  |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>15 January 2020 (Initial Certification Audit)</li><li>8 November 2022 (Surveillance Audit)</li><li>14 July 2023 (Re-Certification Audit and Scope Change)</li><li>13 March 2025 (Surveillance Audit)</li><li>16 April 2026 (Re-Certification Audit and Scope Change)</li></ul>  |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (23 – 24 December 2019)</u></p> <p>The Audit Scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (10 – 11 August 2022)</u></p> <p>The Audit Scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.</p> |

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The supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (5 June – 6 June 2023)

The Audit Scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.

The supply chain activities included in the Audit Scope:

- Material Conversion

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

Surveillance Audit (18 – 19 February 2025)

The Audit Scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.

The supply chain activities included in the Audit Scope:

- Material Conversion

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

Re-Certification Audit and Scope Change (27 January – 30 April 2026)

The Audit Scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin Aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.

The supply chain activities included in the Audit Scope:

- Semi-Fabrication

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

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AUDIT OUTCOME

- Certification

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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

26 February 2026 – 25 February 2029

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

26 August 2027

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CERTIFICATE NUMBER

74

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

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

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

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## ENTITY OVERVIEW

Kunshan Aluminium Co., Ltd. (the 'Entity') was founded in July 2004. It is jointly funded by Hanjiang Group Company Holding and Hong Kong Hanhe Industrial Development Co., Ltd., with registered capital of 443.8 million yuan and a project investment of 960 million yuan. The Entity is located in Kunshan City, Jiangsu Province, China with geographical, human resources, and logistics (seaport) advantages.

The Entity is an Aluminium foil manufacturing enterprise, covering an area of 135,000 square meters (m<sup>2</sup>) with the main plant covering 45,000 m<sup>2</sup>. The Entity utilises leading practice production equipment by ACHENBACH, KAMPF /WT, HERKULES and other manufacturers. The Entity's annual output of thin Aluminium foil is 35,000 tonnes, which is used for food packaging, cigarettes, medicine, daily necessities, cosmetics and other high-grade packaging foil and electric power and electronic industry foil.

## MATURITY RATINGS

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

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

|                    | GOVERNANCE | ENVIRONMENT   | SOCIAL | COMBINED RATING |
|--------------------|------------|---------------|--------|-----------------|
| <b>SYSTEMS</b>     | High       | Medium        | Medium | MEDIUM          |
| <b>RISKS</b>       | Medium     | Medium        | Medium | MEDIUM          |
| <b>PERFORMANCE</b> | High       | Medium        | Medium | MEDIUM          |
| <b>OVERALL</b>     |            | <b>MEDIUM</b> |        |                 |

## FINDINGS

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| <b>1. BUSINESS INTEGRITY</b>                        |             |  |
| 1.1 Legal Compliance                                | Conformance | The Entity has established and implemented comprehensive Policies, systems, procedures, and processes to ensure Compliance with all Applicable Laws, regulations, and customer requirements. Compliance within respective functional areas is overseen by the responsible departments, all of which conduct annual reviews to verify adherence. The Entity has identified and documented pertinent laws, regulations, and requirements, and no significant Compliance issues have been reported to date.   |
| 1.2 Anti-Corruption                                 | Conformance | The Entity has developed and implemented anti-Corruption policies and procedures in accordance with the Code of Business Conduct and Ethics to promote Compliance with relevant anti-Corruption laws and industry standards. High-risk positions have been systematically identified based on predefined risk assessment criteria, and measures such as anti-Corruption commitment statements and enhanced controls have been put in place. The Audit and Supervision Department conducts annual anti-Corruption audits to monitor compliance and identify potential risks, and no incidents of Corruption or major violations have been discovered or reported in the past three years.   |
| 1.3a-e Code of Conduct                              | Conformance | The Entity has implemented a Code of Conduct that integrates key principles addressing environmental protection, social responsibility, and governance performance (ESG). Specific measures, such as training sessions, workshops, and targeted communication efforts, have been introduced to enhance awareness and understanding of the Code among business partners and suppliers, ensuring their alignment with the Entity's standards. The Code of Conduct is systematically reviewed during the annual management review meeting or when significant regulatory changes, internal structural adjustments, or identified control gaps necessitate updates. The Code of Conduct is available at:<br><a href="http://www.akscn.net/Upload/files/1ksly04001.pdf">http://www.akscn.net/Upload/files/1ksly04001.pdf</a>  |
| <b>2. POLICY AND MANAGEMENT</b>                     |             |  |
| 2.1a-f Environmental, Social, and Governance Policy | Conformance | The Entity has implemented management Policies that align with key Environmental, Social, and Governance (ESG) principles. These Policies address areas such as environmental sustainability, workforce well-being, ethical governance, and Stakeholder engagement, ensuring that the Entity operates responsibly and sustainably. Senior management has demonstrated its commitment to these Policies by providing necessary resources, monitoring implementation, and ensuring alignment with the Entity's strategic objectives. The Policies are systematically reviewed during the annual management review meeting or whenever significant regulatory changes, operational shifts, or identified control weaknesses arise. The Entity's Policies are available to internal and external Stakeholders at:<br><a href="http://www.akscn.net/Upload/files/2ksly04002.pdf">http://www.akscn.net/Upload/files/2ksly04002.pdf</a> |
| 2.2a-c Leadership                                   | Conformance | The Vice General Manager, as the ASI Management Representative, oversees the establishment, implementation, and improvement of ASI Standards while ensuring effective communication of ASI Policies  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | through meetings, announcements, and training. A cross-departmental ASI working group coordinates efforts, monitors progress, and ensures alignment with the ASI requirements, and employees are informed and engaged through tailored training, workshops, and awareness campaigns.  |
| 2.3a Environmental and Social Management Systems - Environmental | Conformance    | The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.  |
| 2.3b Environmental and Social Management Systems - Social        | Conformance    | A Social Management System in accordance with the ASI Performance Standard has been established and implemented. Social impacts and relevant risks, including risks related to Human Rights, Occupational Health and Safety, and business ethics, have been identified and assessed. Corresponding management procedures to prevent and/or mitigate these impacts have also been developed and effectively implemented.   |
| 2.4a-e Responsible Sourcing                                      | Conformance    | The Entity has implemented Policies and procedures aligned with responsible sourcing requirements, including annual training for procurement personnel and second-party Due Diligence audits of key suppliers. Purchasing Policies are reviewed periodically during management review meetings or when significant changes in business, ESG risks, or control deficiencies arise. The Policies are available at: <a href="http://www.akscn.net/Upload/files/3ksly04001.pdf">http://www.akscn.net/Upload/files/3ksly04001.pdf</a>  |
| 2.5a-g Environmental and Social Impact Assessments               | Not Applicable | This Criterion is not applicable to the Entity, as no New Projects or Major Changes to the Facility have occurred since the Entity joined ASI.  |
| 2.6a-h Human Rights Impact Assessment                            | Not Applicable | This Criterion is not applicable to the Entity, as no New Projects or Major Changes to the Facility have occurred since the Entity joined ASI.  |
| 2.7a-f Emergency Response Plan                                   | Conformance    | The Entity has implemented an Integrated Emergency Response Plan and an Environmental Emergency Response Plan, the latter registered with government agencies as required. Regular training and drills are conducted to ensure preparedness, and the plans are reviewed every three years or upon significant changes or control gaps, with the Environmental Plan re-registered as needed. Both Plans are available at:<br><br>Integrated Emergency Response Plan:<br><a href="http://www.akscn.net/Upload/files/4ksly04001.pdf">http://www.akscn.net/Upload/files/4ksly04001.pdf</a><br><br>Environmental Emergency Response Plan:<br><a href="http://www.akscn.net/Upload/files/5ksly04001.pdf">http://www.akscn.net/Upload/files/5ksly04001.pdf</a> |
| 2.8a-d Suspended Operations                                      | Conformance    | The Entity has established risk identification and assessment procedures to evaluate major ESG risks, including those arising from potential business suspensions. Measures are in place to address operational adjustments caused by events like natural disasters or regulatory changes. Suspension procedures are reviewed annually or when significant ESG risks or control deficiencies arise. Over the past three years, no operational suspensions have occurred.  |

| CRITERION  | RATING                | COMMENT  |
|--|-----------------------|--|
| 2.9a-b Mergers and Acquisitions  | Conformance           | The Entity has established a procedure for mergers and acquisitions. No such activity has occurred since its establishment in 2004.  |
| 2.10a-b Closure, Decommissioning and Divestment                        | Conformance           | The Entity has established a management procedure for closure, decommissioning, and divestment in line with ASI Performance Standard requirements. Senior management commits to reviewing ESG practices during the planning phase of such activities and will implement a monitoring plan to manage significant ESG impacts in compliance with regulations and best practices. No closure, decommissioning, or divestment activities have occurred in the past three years.  |
| <b>3. TRANSPARENCY</b>   |                       |  |
| 3.1a-b Sustainability Reporting  | Conformance           | The Entity has developed and implemented a sustainability Materiality screening process to identify and prioritise key concerns of Stakeholders, including, but not limited to, corporate governance, anti-Corruption, environmental management, and Labour and Human Rights. The Entity has disclosed its management approach, key initiatives, and performance metrics related to these Material topics in its annual Sustainability Report 2024, available at: <a href="http://www.akscn.net/Upload/files/5ksly04002.pdf">http://www.akscn.net/Upload/files/5ksly04002.pdf</a>                  |
| 3.2 Non-compliance and Liabilities                                     | Conformance           | The Entity did not receive any monetary fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law in 2025. This was verified during the Audit through management interviews and by reviewing the official websites of relevant government agencies and non-government organisations (NGOs). This information is disclosed in the Sustainability Report 2024, page 18: <a href="http://www.akscn.net/Upload/files/5ksly04002.pdf">http://www.akscn.net/Upload/files/5ksly04002.pdf</a>   |
| 3.3a-c Payments to Governments   | Conformance           | The Entity ensures that all payments made to governments, either directly or on its behalf, are conducted on a legal and/or contractual basis. These payments are reported in the Sustainability Report 2024, page 17: <a href="http://www.akscn.net/Upload/files/5ksly04002.pdf">http://www.akscn.net/Upload/files/5ksly04002.pdf</a>   |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance           | The Entity has an effective complaints and grievance handling mechanism, detailed in its management procedure, available at: <a href="http://www.akscn.net/Upload/files/7ksly04001.pdf">http://www.akscn.net/Upload/files/7ksly04001.pdf</a><br><br>No significant complaints have been received to date. Complaints and resolution approaches are reviewed annually during the ASI management review meeting, following changes that impact Material ESG risks or upon indications of control gaps.   |
| <b>4. MATERIAL STEWARDSHIP</b>   |                       |  |
| 4.1a Environmental Life Cycle Assessment                               | Minor Non-Conformance | The Entity has conducted a Product Life Cycle Assessment (LCA) of its primary product, composite food packaging foil, in accordance with the framework and principles outlined in the ISO 14040 and ISO 14044 standards. The assessment aimed to identify and quantify potential environmental impacts across the Product life cycle and was carried out using the cradle-to-gate approach, covering all processes from raw material extraction to the end of manufacturing.<br><br>However, the evaluation of certain environmental impact factors related to specific raw materials was omitted. |

| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
| 4.1b-c Environmental Life Cycle Assessment - Disclosure  | Conformance           | Informed by the results of the Product Life Cycle Assessment (LCA), the Entity has prepared a Product Life Cycle Environmental Impact Assessment Report and commits to transparently disclosing, through established Stakeholder engagement and communication channels, key information to customers regarding the environmental impacts of its Products across the cradle-to-gate life cycle. This includes data such as material consumption, energy consumption, waste generation per unit of product, as well as more detailed information such as data collection processes and calculation analysis procedures. The LCA report is available through the Entity's Stakeholder communication mechanism, via the hotline: 0512-55103083, and email: <a href="mailto:aksjw@akscn.net">aksjw@akscn.net</a> . |
| 4.2 Product Design   | Conformance           | The Entity does not engage in any product design activities. However, it incorporates relevant sustainability goals into its production process controls and raw material procurement processes with the objective to enhance the sustainability of its Products. This includes the environmental life cycle impacts of its final Products.   |
| 4.3a-b Aluminium Process Scrap   | Conformance           | The Entity has minimised the generation of Aluminium Process Scrap within its own operations, and has established procedures for the collection, recycling, and reuse of all generated Scrap, with a target rate of 100%. The Entity's Aluminium Process Scrap recycling strategy is accessible at: <a href="http://www.akscn.net/Upload/files/ksly2306-16.pdf">http://www.akscn.net/Upload/files/ksly2306-16.pdf</a>   |
| 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           | The Entity works with its suppliers to progressively increase the proportion of Post-Consumer Recycled Aluminium in its raw materials, ensuring that product quality requirements are met. In addition, the Entity actively participates in various activities organised by Aluminium industry associations such as the Shanghai Aluminium Industry Association and the China Nonferrous Metals Industry Association, including research into the recycling and use of Post-Consumer Aluminium Scrap, to promote the development of a Circular Economy within the Aluminium industry.   |
| <b>5. GREENHOUSE GAS EMISSIONS</b>   |                       |   |
| 5.1a-b Disclosure of GHG Emissions and Energy Use  | Minor Non-Conformance | According to ISO 14064 standards, the Entity has conducted an organizational-level Greenhouse Gas (GHG) inventory and commissioned a Third Party to verify the relevant emissions data. The Entity has publicly disclosed Scopes 1, 2, and 3 (Category 1 and 4) GHG emissions data, as well as the consumption of raw materials and energy in the 2025 GHG Inventory Report, available at: <a href="http://www.akscn.net/Upload/files/8ksly04001.pdf">http://www.akscn.net/Upload/files/8ksly04001.pdf</a><br><br>A comparison of the Third-Party GHG verification statement reveals that the Scope 3, Category 1 emissions data in the Entity's GHG Inventory Report has not been validated.   |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 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 established a GHG Emissions Reduction Plan, that aims to control the CO <sub>2</sub> emission intensity of its Products from cradle-to-gate to below 9.49 tonnes CO <sub>2</sub> e/t by 2028. The Entity has utilised the ASI Entity GHG Pathways Method and Calculation Tool to verify its emission reduction plan, with the results showing that the Entity's GHG Emissions Reduction Pathway aligns with the 1.5°C warming scenario.  |
| 5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure                   | Conformance    | The Entity has developed a GHG Emissions Reduction Plan to limit CO <sub>2</sub> emissions intensity from cradle-to-gate to below 9.49 tonnes CO <sub>2</sub> e/t by 2028. This goal is supported by technological innovations and managerial measures, including low carbon material procurement, energy efficiency optimisation, renewable energy integration, and improved operational practices. Using the ASI Entity GHG Pathways Method and Calculation Tool with a 2024 baseline, the strategy aligns with global climate goals. Annual reviews are conducted to monitor progress, and the updated GHG Reduction Plan Report (January 2026) is publicly available at:<br><a href="http://www.akscn.net/Upload/files/10ksly04001.pdf">http://www.akscn.net/Upload/files/10ksly04001.pdf</a> |
| 5.4 GHG Emissions Management  | Conformance    | The Entity has implemented a comprehensive GHG Management System based on the Plan-Do-Check-Act (PDCA) approach, integrating energy management, GHG inventory, reduction plans, and target management, with clear departmental responsibilities. Internal audits and management reviews confirm the system's effective operation, driving the achievement of reduction targets and continuous improvement in environmental performance.   |
| <b>6. EMISSIONS, EFFLUENTS AND WASTE</b>  |                |   |
| 6.1a-f Emissions to Air   | Conformance    | The Entity collects and treats air pollutants before discharge, ensuring Compliance with local emission limits. It has implemented an air emission management plan with measures to minimise impacts and annually discloses emissions data. Environmental monitoring in 2025 shows a significant reduction in emissions compared to 2024. The Entity commits to updating its management plan where serious air pollution risks arise. Annual atmospheric pollutant emissions data, reduction plans, and targets are available at:<br><a href="http://www.akscn.net/Upload/files/11ksly04001.pdf">http://www.akscn.net/Upload/files/11ksly04001.pdf</a>  |
| 6.2a-g Discharges to Water  | Conformance    | The Entity does not discharge industrial wastewater and ensures domestic wastewater complies with legal requirements through regular monitoring. The 2025 testing report confirms Compliance with statutory discharge limits. Water consumption and wastewater reduction plans are disclosed annually in the Annual Water Resource Management Plan, which includes water-saving measures. The Entity  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | periodically reviews its water pollutant management plan to address potential control deficiencies.  |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance    | <p>In accordance with the Environmental Management System and legal requirements, the Entity has established the management procedures for Spills and Leakage. The relevant trainings are provided to Workers, and drills are conducted at least annually. The latest version of the Emergency Response Plan is available at:<br/> <a href="http://www.akscn.net/Upload/files/12ksly04001.pdf">http://www.akscn.net/Upload/files/12ksly04001.pdf</a></p> <p>The Entity also plans to update and improve the relevant emergency response and leak or seepage prevention management plans whenever there are any changes that may affect the significant risks associated with leaks and seepage, as well as when there are signs of control weaknesses.</p> |
| 6.4a-b Public Disclosure of Spills and Leakages         | Conformance    | <p>The Entity has outlined the process for reporting Spills and Leakages in its environmental protection management procedure and Emergency Response Plans. There have been no recorded incidents of Spills in the past three years. The most recent versions of the Spills and Leakages Risk Assessment Report and the Emergency Response Plan are publicly available at:<br/> <a href="http://www.akscn.net/Upload/files/12ksly04001.pdf">http://www.akscn.net/Upload/files/12ksly04001.pdf</a></p>  |
| 6.5a-c Waste Management and Reporting                   | Conformance    | <p>The Entity's Environmental Management System includes Waste management strategies that are consistent with the Waste Management Hierarchy , focusing on waste reuse, recycling, process innovation, and facility upgrades. Hazardous Waste disposal complies with legal requirements. The Entity has disclosed 2025 waste generation data and its 2026 waste management goals and plans, available at: <a href="http://www.akscn.net/Upload/files/13ksly04001.pdf">http://www.akscn.net/Upload/files/13ksly04001.pdf</a></p>  |
| 6.6a-g Bauxite Residue                                  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7a-f Spent Pot Lining (SPL)                           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.8a-d Dross  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| <b>7. WATER STEWARDSHIP</b>                             |                |  |
| 7.1a-b Water Assessment and Disclosure                  | Conformance    | <p>The Entity has identified and recorded its water withdrawal and usage in the Environmental Impact Assessment, with approximately 100,000 litres of daily domestic water sourced from a local treatment plant and no water used for production. A water-related risk assessment, considering the surrounding environment and management measures, indicates a low risk. Annual water usage and risk assessment results are available at:<br/> <a href="http://www.akscn.net/Upload/files/14ksly04001.pdf">http://www.akscn.net/Upload/files/14ksly04001.pdf</a></p>  |
| 7.2a-e Water Management                                 | Not Applicable | This Criterion is not applicable to the Entity, as the water-related risks in the Entity's Area of Influence are considered low.   |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| <b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>                                  |                |   |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment            | Conformance    | A Biodiversity and Ecosystem Services risk and Impact Assessment is included in the Environmental Impact Assessment (EIA), which was conducted by qualified third parties and approved by the local Environment Protection Agency. As per the approved EIA, there are no biodiversity-sensitive areas in the Entity's Area of Influence, and the risk level is low. The Entity is located within an industrial zone planned by the local Government and has implemented an effective Environmental Management System.   |
| 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 on Biodiversity and Ecosystem Services are assessed and documented as low, as per the Environmental Impact Assessment approved by the local environment protection agency. No Priority Ecosystem Services have been identified.  |
| 8.2a-g Biodiversity Management   | Not Applicable | This Criterion is not applicable to the Entity, as the risks and potential impacts identified are 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 implemented a management Policy and procedures designed to prevent the introduction of Alien Species. The potential risks associated with the introduction of such species through the Entity's operations and logistics activities have been identified, and an assessment has been conducted to determine if these activities could significantly impact Biodiversity and Ecosystem Services. According to the outcomes of the Biodiversity assessment, the risk of the Entity's activities introducing Alien Species is considered extremely low. |
| 8.5a-b Commitment to "No Go" in World Heritage Properties                      | Conformance    | The Entity has committed 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    | In the Entity's management manual, it is stated that the Entity commits to protecting the environment. There are no Protected Areas present in the Entity's Area of Influence.  |
| 8.6e Protected Areas - Bauxite Mining  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 8.7a-i Mine Rehabilitation   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| <b>9. HUMAN RIGHTS</b>   |                |   |
| 9.1a-d Human Rights Due Diligence  | Conformance    | The Entity has implemented a Human Rights Policy, including a commitment to gender equity and adherence to the UN Guiding Principles on Business and Human Rights, communicated to all employees, available at:<br><a href="http://www.akscn.net/Upload/files/15ksly04001.pdf">http://www.akscn.net/Upload/files/15ksly04001.pdf</a>  |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
|   |                | It annually publishes a Human Rights Impact Assessment Report, detailing community engagement and the Grievance Mechanism. No significant Human Rights impacts have been identified, but the Entity pledges to provide remedies or cooperate through legitimate processes if any adverse impacts occur.   |
| 9.2a-e Gender Equity and Women's Empowerment                                  | Conformance    | <p>The Entity has implemented Policies that respect the rights of women and a program aimed at promoting gender equity and women's empowerment throughout the entire employment process. No complaints have been received from female Workers, and interviews with female employees confirm that they are aware of their rights, with no negative feedback reported.</p> <p>The Entity has assessed its gender equity and women's empowerment program, and the assessment report is available at: <a href="http://www.akscn.net/Upload/files/16ksly04001.pdf">http://www.akscn.net/Upload/files/16ksly04001.pdf</a></p> |
| 9.3a-i Indigenous Peoples   | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence as per the assessment report and definition specified in the ASI Performance Standard. 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 within the Entity's Area of Influence and Free, Prior and Informed Consent (FPIC) has not been required.   |
| 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 Free, Prior and Informed Consent (FPIC) has not been required.   |
| 9.5a Cultural and Sacred Heritage - Identification                            | Conformance    | The Entity has established a process to identify sacred and cultural heritage sites and values within the Entity's Area of influence and implement appropriate actions to avoid or remedy impacts, as well as to ensure continued rights of access to such sites or values. There are no sacred or cultural heritage sites or values within the Entity's Area of Influence.   |
| 9.5b Cultural and Sacred Heritage - Impacts                                   | Not Applicable | This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites or values in the Entity's Area of Influence, nor presence of Indigenous Peoples or their lands, territories and resources.  |
| 9.6a-i Displacement   | Not Applicable | This Criterion is not applicable to the Entity, as it is located within an industrial zone that has been developed by the local government and no resettlement was required. The Entity has a Policy in place to address the resettlement in the frame of legal requirements, which are a government responsibility.  |

| CRITERION   | RATING         | COMMENT   |
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| 9.7a-h Affected Populations and Organisations                             | Conformance    | The Entity has implemented a Policy to respect the legal and customary rights of Local Communities regarding their lands, livelihoods, and use of natural resources. It employs compliance management and risk control procedures to identify and mitigate health, safety, social, cultural, and environmental impacts. Through Stakeholder engagement, the Entity involves Affected Populations and Organisations in management plans, including safety and environmental contingency planning. It collaborates with the Industrial Estate Management Committee on public welfare activities like road safety and fire prevention campaigns. To address its primary impact, air pollutant emissions, the Entity implements an environmental control plan and regularly reports progress to the environmental protection agency, with details disclosed at: <a href="https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&amp;dataid=efba917d33fe4ffea35931ce79631ca8">https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=ge txgkContent&amp;dataid=efba917d33fe4ffea35931ce79631ca8</a> |
| 9.8a Conflict-Affected and High-Risk Areas - Strong management systems    | Conformance    | The Entity has implemented a Policy to commit to not using conflict minerals and established a Management System that includes supply chain mapping, risk assessment, control plans, Due Diligence audits and reporting. The Entity has provided training for all relevant employees. The requirements are communicated to suppliers, and all suppliers sign the commitment letter to not use conflict minerals.  |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks    | Conformance    | The Entity has conducted supply chain risk assessments to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs) based on the results of the communication with suppliers. Based on the risk assessment report, there are no materials sourced from CAHRAs, as all suppliers are in China, and there are no critical Human Rights issues such as Child Labour or 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 its risk assessment determined that there are no materials sourced from CAHRAs, as all suppliers are in China, and there were no red flags in the supply chain.<br><br>Based on the records of the risk assessment, it has been determined that the Entity does not utilise conflict minerals, source materials from Conflict-Affected and High-Risk Areas, or have any critical human rights issues such as Child Labour or forced labour in its supply chain. Therefore, no further action is deemed necessary in this regard.   |
| 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 Audit, which complies with the requirement of this Criterion.   |
| 9.8e Conflict-Affected and High-Risk Areas - Report annually              | Conformance    | The Entity reports on its supply chain Due Diligence on CAHRAs, which details activities for 2025 in the annual supply chain Due Diligence Report: <a href="http://www.akscn.net/Upload/files/17ksly04001.pdf">http://www.akscn.net/Upload/files/17ksly04001.pdf</a>  |
| 9.9 Security practice   | Conformance    | The Entity has established a management procedure to manage security activities to respect Human Rights. Security guards are positioned only at the Entity's entrance gate for Visitor management, and body searches and/or restriction of Worker movement is not permitted. Training is provided to security guards. Interviews with security personnel confirmed their understanding of respecting Human Rights. No grievance or complaint against security activities has been received to date.   |

| CRITERION  | RATING         | COMMENT  |
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| <b>10. LABOUR RIGHTS</b>   |                |  |
| 10.1a-c Freedom of Association and Right to Collective Bargaining  | Not Applicable | This Criterion is not applicable to the Entity, as 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    | The Entity demonstrates that they respect the right to Freedom of Association and Collective Bargaining. Workers' representatives, who are freely elected by employees, raise Workers' concerns with management on their behalf.   |
| 10.2a-c Child Labour   | Conformance    | In Compliance with Chinese law, which prohibits Child Labour and establishes the minimum working age of 16 years, the Entity has implemented policies explicitly banning Child Labour and ensuring the protection of young Workers. Currently, no Child Labour or young Workers are employed at the Entity.  |
| 10.3a-c Forced Labour  | Conformance    | The Entity has implemented a Policy prohibiting Forced Labour and Human Trafficking, requiring the same compliance from its suppliers. Audits confirm that the Entity does not engage in or support Forced Labour or Human Trafficking. Workers are directly hired, do not pay Recruitment Fees or deposits, retain their identity documents, have freedom of movement, and can terminate their employment with prior notice.<br><br>The Entity's Modern Slavery Statement is publicly available at: <a href="http://www.akscn.net/Upload/files/18ksly04001.pdf">http://www.akscn.net/Upload/files/18ksly04001.pdf</a> |
| 10.4a-c Non-Discrimination   | Conformance    | The Entity is committed to non-Discrimination. The Entity's recruitment advertisements and training plan confirm that hiring decisions are solely based on the candidate's ability to perform the job's requirements rather than on other personal characteristics, and that equal pay for the same work is provided. This was verified through Worker interviews, who confirm they are treated equally. No case of Discrimination has been received to date.  |
| 10.5 Communication and engagement  | Conformance    | The Entity maintains open communication with Workers and their representatives, providing channels to raise concerns about working conditions, workplace issues, and compensation without fear of reprisal. Regular meetings between management and Workers' representatives ensure that complaints are discussed and resolved collaboratively.  |
| 10.6a-g Violence and Harassment  | Conformance    | The Entity respects its employees, and disciplinary measures implemented comply with legal requirements and require the confirmation of the involved Worker. The Entity does not engage in nor tolerates 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 Entity's ASI Policy, available at: <a href="http://www.akscn.net/Upload/files/2ksly04002.pdf">http://www.akscn.net/Upload/files/2ksly04002.pdf</a>                                       |
| 10.7a-d Remuneration   | Conformance    | The Entity's wage structure is clearly defined, and the basic wage meets local legal minimum wage. Total payments meet the Workers' basic need. The Entity documents wage payments and all Workers are paid in a timely manner by bank transfer on the 10 <sup>th</sup> of the   |

| CRITERION  | RATING                | COMMENT  |
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|  |                       | following month. Detailed information on wages, allowance, Overtime work compensation, and deductions is included in the payslip.  |
| 10.8a-c Working Time   | Minor Non-Conformance | <p>The Entity's regular working hours for office staff and 27% of Workers are 40 hours per week over five days, while 73% of production Workers operate on a three-shift system, working six days followed by two days off. Working hours are monitored, ensuring all Workers have at least one day off per week, and mostly comply with the legal monthly Overtime limit.</p> <p>However, it was identified that some employees exceeded 36 hours of Overtime in a given month.</p>   |
| 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. National laws and regulations are respected .   |
| <b>11. OCCUPATIONAL HEALTH AND SAFETY</b>  |                       |  |
| 11.1a Occupational Health and Safety (OH&S) Management System                            | Conformance           | The Entity has established, implemented, and maintained an Occupational Health and Safety (OH&S) Management System that is continually improved and certified to ISO 45001:2018. Through on-site observations, document reviews, and interviews with management and Workers, it is determined that 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 regularly evaluates its OH&amp;S Management System through monthly safety meetings, annual legal compliance reviews, ISO 45001:2018 internal audits, and management review meetings. Any identified control gaps are promptly analysed to determine and implement corrective or preventive actions. The Entity has published its 2025 OH&amp;S objectives and targets, along with performance comparisons against industry peers and best practices, in its Sustainability Report 2024, pages 8-10:</p> <p><a href="http://www.akscn.net/Upload/files/5ksly04002.pdf">http://www.akscn.net/Upload/files/5ksly04002.pdf</a></p> |
| 11.2 Employee engagement on Health and Safety  | Conformance           | The Entity has established a Health and Safety Management Committee, which convenes regular meetings to monitor the Health and Safety conditions within the Facility and actively promote advancements in Health and Safety practices. To solicit feedback from employees regarding OH&S issues, the Entity has implemented various communication channels such as suggestion boxes, and Workers' representative assemblies. Through this communication mechanism, employees are encouraged to report and participate in resolving Health and Safety-related concerns.   |

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## DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE              | NOTES   |
|----------|-------------------|---|
| 0        | 26 February 2020  | Issued (Full Certification)   |
| 1        | 29 March 2021     | Revised to correct public headline statements relating to Criteria 9.3, 9.4, 9.5, 9.6a and b.   |
| 2        | 15 December 2022  | Surveillance Audit  |
| 3        | 27 September 2023 | Re-Certification Audit and Scope Change – Full Certification.<br>Scope change to apply V3.<br>A five-month extension was granted to the Initial Certification Period as a result of Covid / main contact change   |
| 4        | 9 October 2025    | Surveillance Audit<br>Correction to the supply chain activity to align with naming conventions in PS V3.<br>Revision of the Audit Scope description for the Initial Certification Audit to remove unrelated information.  |
| 5        | 4 June 2026       | Re-Certification Audit and Scope Change – Full Certification<br>Scope Change to correct the supply chain activities to 'Semi-Fabrication';<br>Correction to Rev 4 to the conformance rating for Criterion 4.1a to 'Conformance'<br>and to include Criterion 5.3b-e as 'Conformance' |

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