

# ASI CERTIFICATION PERFORMANCE STANDARD

PRESENTED TO

## Suntown Technology Group Corporation Limited

CERTIFICATE NUMBER  
**25**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3 2022)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

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

DATE OF ISSUE  
**30 OCTOBER 2023**

DATE OF EXPIRY  
**29 OCTOBER 2026**

CERTIFIED SINCE  
**30 APRIL 2019**

### AUTHORISED BY



Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

### CERTIFICATION SCOPE

Suntown Technology Group  
Corporation Limited including the  
Aluminium re-melting, refining and  
recycling and semi-fabrication  
activities associated with the  
manufacture of aluminium foil at  
sites in Changsha and Changde  
(China).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Suntown Technology Group Corporation Limited
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	Suntown Technology Group Corporation Limited including the Aluminium re-melting, refining and recycling and semi-fabrication activities associated with the manufacture of Aluminium foil at sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (12 – 15 March 2019)</li><li>Re-Certification Audit and Scope Change (28 – 29 September 2022)</li><li>Surveillance Audit (25 – 27 March 2024)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>12 – 15 March 2019 (Initial Certification Audit)</li><li>28 – 29 September 2022 (Re-Certification Audit and Scope Change)</li><li>25 – 27 March 2024 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>11 April 2019 (Initial Certification Audit)</li><li>6 January 2023 (Re-Certification and Scope Change Audit)</li><li>19 April 2024 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 15 March 2019)</u></p> <p>The audit scope covered Suntown Technology Group Corporation Limited including the aluminium re-melting, re-fining and re-cycling and semi-fabrication activities with the manufacture of aluminium foil at the sites in Changsha and Changde (China).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>

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Re-Certification Audit and Scope Change (28 – 29 September 2022)

The audit scope covered Suntown Technology Group Corporation Limited including the aluminium re-melting, re-refining and re-cycling and semi-fabrication activities with the manufacture of aluminium foil at the sites in Changsha and Changde (China).

Supply chain activities included in the audit scope:

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

All applicable criteria in the ASI Performance Standard were included in the audit scope.

Surveillance Audit (25 – 27 March 2024)

The audit scope covered Suntown Technology Group Corporation Limited including the Aluminium re-melting, re-refining and re-cycling and semi-fabrication activities with the manufacture of aluminium foil at sites in Changsha and Changde (China).

Supply chain activities included in the audit scope:

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

All applicable criteria in the ASI Performance Standard were included in the audit scope.

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AUDIT OUTCOME

- Full 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

30 October 2023 – 29 October 2026

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

29 April 2025

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CERTIFICATE NUMBER

25

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

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

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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

Suntown Technology Group (SNTO) (the 'Entity') was established in 2003, and has its headquarters located in the Wangcheng District, Changsha City, Hunan Province. Its main products include double zero Aluminium foil for food packaging in the food and beverage industry, as well as Aluminium templates for construction. The annual total production of Aluminium foil products is approximately 150,000 tonnes.

The Entity operates primarily through two production plants, including the Changde factory, responsible for remelting and casting rolling processes, and the Changsha factory, which handles cold rolling and packaging procedures. The Certification Scope covers the Entity's production of its double zero Aluminium foil products. The Entity's production of its Aluminium foil products involves approximately 500 employees.

## MATURITY RATINGS

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

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

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established and implemented a management process for the identification and assessment of ASI-related legal requirements and other requirements. The compliance evaluation is conducted annually, and results are recorded.
1.2 Anti-Corruption	Conformance	The Entity has established a Policy and management procedure on anti-Corruption. The anti-Corruption Policy is communicated to all Stakeholders. The whistleblowing channel, investigation process and disciplinary procedure have been established. The Entity has identified and assessed risks relating to business ethics, high risk positions and has implemented control measures as required.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct that addresses the environmental, social and governance principles of the ASI Performance Standard. The Code of Conduct is reviewed during the annual management review meeting, or upon changes to the Business, or on indication of a control gap. The Code is publicly disclosed at: <a href="http://www.chinasnto.com/bocupload/202404/1.3%20Code%20of%20Conduct%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/1.3%20Code%20of%20Conduct%20(Public%20Version).pdf</a>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented ASI Management Policies that address the Environmental, Social and Governance (ESG) practices included in the ASI Performance Standard. These Policies have been approved by the Entity's General Manager, who demonstrates a commitment to implement the Policies through provision of resources. The ASI Management Policies are reviewed during the annual management review meeting, or upon changes to the Business, or on indication of a control gap.  The Policies are posted throughout the site and are communicated with employees. Training is also undertaken for relevant employees. The Policies are publicly disclosed at: <a href="http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Policies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Policies%20(Public%20Version).pdf</a>
2.2a-c Leadership	Conformance	A senior Management Representative has been appointed and responsibilities and authorities of this role and other management are defined to implement the ASI Standards, including to lead the communication of the Policies and providing the needed resources.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established, implemented, maintains and continually improves its ISO 14001:2015 certified Environmental Management System.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established and implemented a Social Management System. Social and Occupational Health and Safety impacts have been identified and assessed, and the associated management provisions for preventing and/or mitigating these impacts have been established and implemented.



CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented a Responsible Procurement Policy, Supplier Code of Conduct, procedures and processes that conform to the responsible sourcing requirements. The Entity conducts second party Due Diligence audits at major suppliers' sites.</p> <p>The Responsible Procurement Policy and Supplier Code of Conduct are available at:  <a href="http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Polocies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.1%20ESG%20Polocies%20(Public%20Version).pdf</a> and  <a href="http://www.chinasnto.com/bocupload/202404/2.4%20Code%20of%20Conduct%20for%20Suppliers%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.4%20Code%20of%20Conduct%20for%20Suppliers%20(Public%20Version).pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the past two years. Regardless, the Entity annually assesses their impacts regarding the environment, health and safety, and social responsibility including Human Rights.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes in the past two years. Regardless, the Entity annually assesses their impacts regarding social responsibility including Human Rights and how Baseline Conditions are affected by Historic Aluminium Operations.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has adequate and effective Emergency Response Plans (ERP) that addresses crisis organisation, communication guidelines and business recovery plans. An Emergency Response Team (ERT) is established and is trained annually. The ERP for Environment, Health, and Safety (EHS) is registered with the local bureau. Drills for the ERP are performed annually. The ERP is available upon request.</p> <p>In collaboration with Workers, Affected Populations and Organisations and relevant agencies, the Entity has established Emergency Response Plans (ERP) for identified emergency situations addressing environmental and production safety for both Facilities.</p> <p>Employees are provided the relevant training courses on the ERPs and remedy plan, and drills are conducted for fire/evacuation and chemical leaks.</p> <p>The ERPs are reviewed and revised every three years in accordance with legal requirements and reviewed upon Major Changes or on indication of a control gap. The ERPs for the Changsha site are publicly disclosed at:  <a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Environmental%20Emergencies%20(Public%20Version).pdf</a> and  <a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf</a></p> <p>However, the ERPs for the Changde site have not yet been publicly disclosed.</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Management (BCM) system for identified emergency situations that may cause a suspension of the Business, alter the operations or adversely impact environmental, social and governance risks, and has established associated control measures. The BCM Manual is reviewed in the

CRITERION	RATING	COMMENT
		annual management review meeting, and upon any changes to the Business, or indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established the management process for mergers and acquisitions based on the requirement of the ASI Performance Standard. No such activity has occurred in the past three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Policy and procedures to handle closures, decommissioning and divestment. No such activity has occurred in the past three years.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its annual Sustainability Report for 2023, which discloses its governance approach to environmental, social and economic impacts and its performance regarding governance, environment, Human Rights and Labour Rights:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has disclosed information related to non-compliance and liabilities in its Sustainability Report 2023. There were two warning cases from the local Environment Protection Bureau, which are disclosed in Section 2, Chapter 3:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>All payments to governments are legally required, including taxes, social insurances and pensions. The information is publicly disclosed in the Sustainability Report 2023, Section 2.2, Chapter 4:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.7%20Emergency%20Response%20Plan%20for%20Production%20Safety%20(Public%20Version).pdf</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established various whistleblowing/ complaints/ grievance channels including a hotline for external stakeholders (86-400-056-2828) and employees (0731-89620920) and an email address (<a href="mailto:snto_shenji@chinasnto.com">snto_shenji@chinasnto.com</a>). A Stakeholder complaints management procedure has been established and implemented.</p> <p>The Entity's ASI PS Management Manual has defined that the Complaints Resolution Mechanism shall be reviewed in the annual management review meeting, upon a change to the Business, or on indication of a control gap. The Complaints Resolution Mechanism is publicly disclosed in the Group Stakeholder Complaint Management Regulations:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/3.4%20Stakeholder%20Complaint%20Management%20Regulations%20and%20Annual%20Review%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.4%20Stakeholder%20Complaint%20Management%20Regulations%20and%20Annual%20Review%20(Public%20Version).pdf</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has employed its ISO 14001:2015 Environmental Management System to scrutinise the environmental implications of its



CRITERION	RATING	COMMENT
		<p>manufacturing activities and product portfolio. Additionally, it adheres to the guidelines of its ASI PS Management Manual and has conducted a comprehensive evaluation of the life cycle impacts of its major Product lines. The production of the Entity's Aluminium foil products, consisting of a single alloy type, undergoes a cradle-to-gate lifecycle appraisal encompassing all primary manufacturing procedures. This evaluation is undertaken utilising the Entity's proprietary format, instead of adopting an ISO standard approach.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has undertaken a comprehensive cradle-to-gate Life Cycle Assessment (LCA) on its Aluminium products. The information included in the publicly available LCA covers the basic assumptions, system boundaries and associated data, available at: <a href="http://www.chinasnto.com/bocupload/202404/4.1%20LCA%20Report(Abstrat,%20Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/4.1%20LCA%20Report(Abstrat,%20Public%20Version).pdf</a></p> <p>The Entity has committed to providing the entire LCA report via external communication upon request.</p>
4.2 Product Design	Conformance	<p>The Entity has implemented protocols for the integration of LCA into the Product design process. This LCA mandate necessitates the consideration of multiple environmental factors, such as carbon footprint, energy usage, water consumption, air emissions, and waste generation among others. Currently, the emission of Greenhouse Gases (GHG) has been incorporated into the design methodology, as guided by the Entity's specific sustainability objectives.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established a target for the collection, recycling, and/or reuse of Process Scrap at 100%, and a Scrap management procedure has been established to ensure the achievement of this objective. The Entity has implemented various technological and management measures to reduce the generation of Aluminium Process Scrap in its own operational processes. It also collects and recycles Aluminium Process Scrap that is internally generated.</p> <p>With the current single alloy composition, there is no need for separation of Process Scrap. The target of 100% collection, recycling, and/or reuse of Scrap has been largely accomplished.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has developed a strategy for utilising Recycled Aluminium, with the final goal for 2028, to reach an annual consumption of 60,000 tonnes of Recycled Aluminium, which is equivalent to 40-60% of the Entity's total annual raw material consumption.</p> <p>The Entity has committed to annually review the achievement of its Recycled Aluminium targets and adjusting the related strategies, targets and plans following annual management review meetings.</p> <p>The recycling strategy is publicly disclosed on the Entity's website at: <a href="http://www.chinasnto.com/bocupload/202404/4.4%20Recycled%20Aluminium%20Project%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/4.4%20Recycled%20Aluminium%20Project%20(Public%20Version).pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>China does not have a well-developed system for collecting and recycling Aluminium Scrap at the local, regional, or national level, and as such, the Entity depends on other companies within the SNT0 Group to collect and reuse Post-Consumer Aluminium Scrap. The SNT0 Group is continually improving its cooperation with customers to increase the recycling rate of Aluminium Scrap.</p>

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>In accordance with the ISO 14064 Standard, the Entity has conducted an inventory of its Greenhouse Gas (GHG) emissions at the organisational level and engaged a Third Party to verify the relevant emissions data. As disclosed in the GHG Inventory Report, the Entity's GHG emissions in 2023 were 901,416 tonnes CO<sub>2</sub>e:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/5.1%20%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/5.1%20%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf</a></p> <p>The 2023 GHG Inventory Report has included Scope 3 and Scope 4 GHG emissions in its calculations and reporting scope.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan, which aims to control the CO<sub>2</sub> emissions intensity of its Products from cradle-to-gate below 11.5 tonnes CO<sub>2</sub>e/tonne Aluminium by 2030. To achieve its GHG emissions reduction strategy, the Entity has implemented or planned a series of technological and managerial measures, including the use of 'clean energy', increasing the proportion of recycled materials, procuring low-energy consumption Aluminium ingots, and enhancing energy efficiency in production processes.</p> <p>The Entity has utilised the ASI Entity GHG Pathways Calculation Tool to verify its GHG Emissions Reduction Plan, with the results demonstrating that the Entity's GHG Emissions Reduction Pathway aligns with the requirements of the 1.5°C scenario.</p> <p>The Entity has publicly disclosed its GHG Emission Reduction Plan at: <a href="http://www.chinasnto.com/bocupload/202404/5.1%20%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/5.1%20%205.3%20Greenhouse%20Gas%20Report%20(Public%20Version).pdf</a>.</p> <p>Additionally, the Entity commits to annually review the progress of its GHG Emissions Reduction Plan implementation and disclose updates and improvement measures related to the plan.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and uses a carbon Management system for both factories and products and obtained a carbon footprint statement from CQC. GHG and energy monitoring records are provided for review. A GHG Emission Reduction Plan has also been developed, which is incorporated as part of the Entity's business improvement strategies and plans. The methodology for determining direct and indirect emissions is also specified. The implementation of this Plan is reviewed monthly.</p> <p>The Entity has compiled the GHG Emissions Reduction Plan to define the management approaches on GHG emissions, with a primary focus on energy management. Site observation, document review and interviews determined that the Entity manages energy consumption and monitors the Management System performance,</p>

CRITERION	RATING	COMMENT
		following the Plan-Do-Check-Action approach, to achieve the GHG Emissions Reduction Plan.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's main sources of air pollution are Volatile Organic compounds (VOCs) and nitrogen oxides (NOx) emissions. The Entity has developed a plan to reduce these pollutants and established an Air Emissions Management Program that involves regular maintenance of air pollution control facilities and frequent assessment of exhaust emissions. The Entity updates its Air Emissions Management Plan whenever there are serious risks related to air pollution emissions, and reviews the Plan regularly. Annual reports on air pollutant monitoring demonstrate compliance with regulatory requirements. The Entity has publicly disclosed its Emissions to Air and its reduction plans in the Emissions of Waste Gas and Wastewater Pollutants Report:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/6.1%20%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.1%20%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity only undertakes Aluminium casting rolling and foil rolling processes, which do not produce any process wastewater during the manufacturing process. Based on the evaluation of water resources and the annual monitoring of domestic wastewater discharge, the Entity's use of domestic water has a very low impact on water resources and the environment. Nonetheless, the Entity has established a goal to decrease wastewater discharge by between two and five percent by 2024. The Entity has committed to developing a plan as required should any process wastewater be generated in the future. The Entity's Emission of Waste Gas and Wastewater Pollutants Report is disclosed at:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/6.1%20%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.1%20%206.2%20Pollutant%20Statistics%20and%20Abatement%20Plan%20(Public%20Version).pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a procedure to assess and manage the risks of Spills and Leakages of pollutants, and has developed appropriate emergency response actions and plans. The risk identification and Emergency Response Plans (ERPs) are publicly available at:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf">http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</a></p> <p>The Entity has undertaken monitoring to detect any possible sources of Spills and Leakages. The Entity has also committed to update and improve the relevant ERPs and Leak or Seepage Prevention Management Plans whenever there are any changes that may affect the significant risks associated with Spills and Leakages, or on indication of weaknesses in control.</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 ERPs are publicly available at:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf">http://www.chinasnto.com/bocupload/202404/6.3%20Leakage%20Risk%20Identification%20and%20Control%20Programme.pdf</a></p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is addressed in the Entity's Environmental Management System. The Entity has implemented a Waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates any Material impacts through the reuse and recycling of Waste. The disposal of Hazardous Waste is in compliance with the applicable legal requirements. The Entity has publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated from its activities in 2023 in the Solid Waste Management Report:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/6.5%20Solid%20and%20Hazardous%20Waste%20Generated%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/6.5%20Solid%20and%20Hazardous%20Waste%20Generated%20(Public%20Version).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	Conformance	<p>The Entity has developed a system to collect and reuse Aluminium Dross. The Entity evaluates the management of Dross reuse monthly and Dross residues are used by other companies in products such as building materials. An annual onsite inspection of the Dross reuse company is undertaken to ensure Dross are not inappropriately disposed of. The Entity has created a plan to increase the extraction of Aluminium by processing Dross residue and increase reuse of processed Dross.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity has measured and documented its water intake and usage based on the source and type of water in the Environmental Impact Assessment and water resource risk assessment. The Entity has evaluated the water-related risks, taking into account the nearby water environment, water intake and discharge, and the effectiveness of existing management measures. The Entity's water resource risk is low, and there are no significant water-related risks within the Entity's Area of Influence.</p> <p>The Entity has prepared a Water Resources Assessment Report and Management Plan, which includes a water balance diagram, available at:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/7.1%20Water%20Resources%20Risk%20Assessment%20Report%20&amp;%20Management%20Plan%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/7.1%20Water%20Resources%20Risk%20Assessment%20Report%20&amp;%20Management%20Plan%20(Public%20Version).pdf</a></p> <p>However, the analysis process and conclusions in the Water Resources Assessment Report have not considered the full water consumption for the Changde site, nor does it include relevant data on local groundwater.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's water-related risks are identified and assessed as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>A qualified third party conducted the Environmental Impact Assessment (EIA), which included the evaluation of Biodiversity and Ecosystem Services risks and impacts, and the local environmental</p>

CRITERION	RATING	COMMENT
		protection agency has approved the EIA Report. According to the EIA and the Biodiversity risk assessment outcomes, the Entity's Area of Influence does not include any areas that are sensitive for Biodiversity. The Entity is situated within an industrial zone that the local government has planned and has a functional Environmental Management System. Therefore, the risk level is determined as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable as the risks and potential impacts identified are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, 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, as Priority Ecosystem Services have been identified and the result of the biodiversity risk assessment determined the impact to these Ecosystem Services is low.
8.4 Alien Species	Conformance	The Entity has assessed the risk of Alien Species and implemented control measures for the high risks identified. An inventory of alien and/or invasive species is maintained and the Entity has implemented a management plan to proactively prevent the accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. Training on the management of Alien Species has been provided to both Workers and contractor personnel. Management review is conducted annually.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed within its ASI PS Management Manual 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	The Entity has committed within its ASI PS Management Manual to protecting the environment. As outlined in the EIA Report, and approved by local EPA, there are no Protected Areas 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	<p>The Entity has implemented a Policy with the commitment to respect Human Rights including Gender Equity, and has communicated the Policy to all employees:</p> <p><a href="http://www.chinasnto.com/bocupload/202404/2.6%20Human%20Rights%20Impact%20Assessment%20Reports%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/2.6%20Human%20Rights%20Impact%20Assessment%20Reports%20(Public%20Version).pdf</a></p> <p>The Entity has established and implemented a Human Rights Due Diligence process and maps the Affected Populations and Organisations. The risks relating to Human Rights are identified and assessed, and the control plan for Human Rights impacts is</p>



CRITERION	RATING	COMMENT
		established and implemented. The Human Rights Due Diligence process is reviewed in the annual management review meeting.
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies to respect for the rights of women and a program to promote gender equity and women's empowerment in the whole employment process.</p> <p>No complaints have been received from female Workers and the interviewed female Workers confirmed that they know their rights and no negative feedback was received.</p> <p>The Entity has assessed the program on gender equity and women's empowerment and has disclosed this report at: <a href="http://www.chinasnto.com/bocupload/202404/9.2%20Report%20on%20the%20Effectiveness%20of%20Gender%20Equality%20Measures%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/9.2%20Report%20on%20the%20Effectiveness%20of%20Gender%20Equality%20Measures%20(Public%20Version).pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites are affected by Changsha and Changde sites.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity does not have projects that have caused or require resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a Stakeholder engagement process to actively identify and address the primary concerns of the Affected Population and Organisations. To effectively respond to these concerns, the Entity has developed a range of plans. These plans are regularly reviewed on an annual basis, and any necessary improvements are identified and implemented. The Entity's performance in executing these plans and actions is disclosed in the Sustainability Report and the Prevention and Mitigation Plan for Adverse Impacts on Neighbouring Stakeholders: <a href="http://www.chinasnto.com/bocupload/202404/9.7%20Plans%20to%20prevent%20and%20reduce%20negative%20impacts%20on%20Neighbouring%20Stakeholders%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/9.7%20Plans%20to%20prevent%20and%20reduce%20negative%20impacts%20on%20Neighbouring%20Stakeholders%20(Public%20Version).pdf</a></p>



CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Policy to not using conflict minerals and has established and implemented an appropriate Management System. The Entity has provided training for all relevant employees, and the Policy and requirements are communicated to suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment and requires suppliers to complete a Responsible Mineral Due Diligence Management Form to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs). As confirmed by the risk assessment report, there are no materials sourced from CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	Through the Entity's internal assessment, no materials have been sourced from CAHRAs. However, the strategy to respond to identified risks, if they are identified in future, has been established.  The Entity has conducted Due Diligence monitoring on its Aluminium supply chain. The risk identification and assessment determined that no raw materials are sourced from CAHRAs, the risk is low, and no further actions are currently required.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has conducted a supply chain risk assessment and requests suppliers to conduct a self-assessment that addresses the requirements on CAHRAs. Two major suppliers have been audited against the ASI Performance Standard and the other two material suppliers are ASI Certified.  The Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has defined within its ASI PS Management Manual the requirement for annual public reporting on the performance of supply chain Due Diligence regarding CAHRAs. The Entity's performance of its supply chain Due Diligence is disclosed in the Sustainability Report 2023, Section 3.2: <a href="http://www.chinasnto.com/bocupload/202404/3.1%202023%20Sustainable%20Development%20Report%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/3.1%202023%20Sustainable%20Development%20Report%20(Public%20Version).pdf</a>  However, whilst the performance on supply chain management is disclosed in the Sustainability Report, the Entity's performance on supply chain Due Diligence regarding CAHRAs is not currently disclosed.
9.9 Security practice	Conformance	The Entity has implemented a security Policy that addresses Human Rights. The security guards are trained on rights and responsibilities in terms of respecting internal and external Stakeholders, including Workers.  The responsibilities and authorities of security guards are limited to personnel safety and property safeguarding, vehicle management, and visitor registration. Body searches are not permitted and the restriction on Workers' movement is prohibited. All security activities are to be undertaken in a way that respect Human Rights. Specific training is provided to security guards.  No complaints against security activities have been received.

## 10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as there are some restrictions on the right to Freedom of Association in China. Regardless, the Entity has a Policy to respect the Freedom of Association and has implemented an employee representative committee and employee representatives are freely elected by employees.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity supports alternative means of association for employees via an employee representative committee. The representatives are freely elected. The representatives hold meetings with management to consider and manage any employee concerns.
10.2a Child Labour	Conformance	There is no Child Labour or young Workers at the Entity. The youngest Worker was born in May 2005 and commenced work at the Entity in February 2024.
10.3a-c Forced Labour	Conformance	<p>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.</p> <p>Worker and management interviews, document review and site observations confirmed that the Entity neither engages in nor supports the use of Forced Labour. Workers are hired directly by the Entity, and do not pay any fees or deposits associated with employment. No loans are provided to Workers. Workers retain their identity documents. The basic freedom of movement is respected by the Entity and there are no unreasonable restrictions. Workers can freely terminate their employment with appropriate prior notice.</p> <p>The Entity has prepared and disclosed a 2023 Modern Slavery Statement, available at:  <a href="http://www.chinasnto.com/bocupload/202403/10.3%20%E6%99%9F%E9%80%9A%E7%8E%B0%E4%BB%A3%E5%A5%B4%E5%BD%B9%E5%A3%B0%E6%98%8E2023%E5%BC%88%E6%8A%AB%E9%9C%B2%E7%A8%BF%E5%BC%89.pdf">http://www.chinasnto.com/bocupload/202403/10.3%20%E6%99%9F%E9%80%9A%E7%8E%B0%E4%BB%A3%E5%A5%B4%E5%BD%B9%E5%A3%B0%E6%98%8E2023%E5%BC%88%E6%8A%AB%E9%9C%B2%E7%A8%BF%E5%BC%89.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and no case of Discrimination has been reported or found during the Audit. The recruitment advertisements and the training, promotion and termination records indicate decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. The Entity provides training courses on Discrimination to promote a culture of non-Discrimination. The payment records demonstrate equal pay for the same work. Interviewed Workers confirmed that they feel equal within the Entity.
10.5 Communication and engagement	Conformance	The Entity has established direct and frequent communication channels with the Workers and the Worker representatives. Workers can make complaints and raise concerns regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has a Policy that prohibits any form of Violence and Harassment. As part of the Entity's risk management processes, with Workers participation, the Entity has identified and assessed the risks of Violence and Harassment, and established and implemented the

CRITERION	RATING	COMMENT
		<p>control measures to prevent its occurrence. Training courses are provided to all Workers, and Workers are made aware of how to report cases. No case on Violence or Harassment has been reported or found in the Entity in the past three years.</p> <p>The Policy is reviewed in the annual management review meeting or when there is a major business change or a control gap. The Policies are disclosed at:  <a href="http://www.chinasnto.com/bocupload/202403/21%E7%A4%BE%E4%BC%9A%E3%80%81%E7%8E%AF%E5%A2%83%E3%80%81%E5%81%A5%E5%BA%B7%E5%92%8C%E5%AE%89%E5%85%A8%E7%AE%A1%E7%90%86%E6%94%BF%E7%AD%96%EF%BC%88%E6%8A%AB%E9%9C%B2%E7%A8%BF%EF%BC%89.pdf">http://www.chinasnto.com/bocupload/202403/21%E7%A4%BE%E4%BC%9A%E3%80%81%E7%8E%AF%E5%A2%83%E3%80%81%E5%81%A5%E5%BA%B7%E5%92%8C%E5%AE%89%E5%85%A8%E7%AE%A1%E7%90%86%E6%94%BF%E7%AD%96%EF%BC%88%E6%8A%AB%E9%9C%B2%E7%A8%BF%EF%BC%89.pdf</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity ensures labour contracts are established with all employees within one month of commencing work. The terms and conditions of the labour contract meet the requirements of the labour contract law. The wage structure is clearly defined, the basic wage is above the legal minimum wage and total remuneration meets the Workers' basic needs. Overtime is paid following the legal requirements, of 150% of the regular wage for overtime on working days, 200% for weekend work, and 300% for public holidays.</p> <p>Wage payments are made on time and without delay.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours are recorded by a finger-scanning meter. The regular working hours are 40 hours a day, five days a week. Working hours are monitored and the monthly Overtime working hours do not exceed the legal monthly limit, and at least one day off in a week is guaranteed.</p> <p>The Entity provides leave to eligible Workers as required by Applicable Law, however, parental leave is not currently provided.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights during orientation training, the provision of an Employee Growth Manual, and billboards on-site.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established, implemented, and maintains an Occupational Health and Safety (OH&amp;S) Management System that is being continually improved. Both of the Entity's Facilities hold valid ISO 45001:2018 certification.</p> <p>On-site observations, document review, and interviews with management and Workers confirmed that the OH&amp;S Management System is effective. This indicates that the system is successfully preventing workplace hazards, promoting a safe and healthy working environment, and complying with relevant regulations and standards.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity periodically evaluates its OH&amp;S Management System through various methods, including monthly safety meetings, an annual check of legal compliance, an annual internal audit based on ISO 45001:2018, and management review meetings. If any indication of a control gap emerges during these evaluations, a comprehensive analysis is undertaken to determine the need for potential corrective and/or preventive actions. This proactive approach ensures that any issues or gaps in the OH&amp;S Management System are quickly resolved.</p> <p>The Entity has published its OH&amp;S objectives and targets for 2023, as well as comparative analyses of performance with peer businesses</p>

CRITERION	RATING	COMMENT
		and leading practice in the annual OH&S Management System Performance Report: <a href="http://www.chinasnto.com/bocupload/202404/11.1%20Operation%20of%20the%20OH&amp;S%20Management%20System%20(Public%20Version).pdf">http://www.chinasnto.com/bocupload/202404/11.1%20Operation%20of%20the%20OH&amp;S%20Management%20System%20(Public%20Version).pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	Environment, Health, and Safety Committees are established at both the Changsha and Changde sites. Committee meetings are undertaken regularly to understand the health and safety conditions of the factory and work to promote the development of the health and safety conditions of the Entity.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 April 2019	Initial Certification Audit – Full Certification
1	13 June 2023	Re-Certification and Scope Change Audit – Provisional Certification. Scope Change to apply PS V3. Change of Audit Firm to TÜV SÜD.
2	2 May 2024	Surveillance Audit – Full Certification Correction to Rev 1 to include notice of approval for six month extension to the Certification Period due to a COVID-19 delay, resulting in expiry of 29 October 2022; Correction to Rev 1 Certification Period dates to 30 October 2022 – 29 October 2023 to reflect continuous period of Certification; Correction to Rev 1 Document Control table to reflect Rev 0 Date as 30 April 2019; Change of Audit Firm to DNV Business Assurance Services UK Ltd.