

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

REAL ALLOY – COLDWATER NORTH AND SOUTH FACILITIES

CERTIFICATE
NUMBER

232

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

ERM
CERTIFICATION
AND
VERIFICATION
SERVICES

DATE OF ISSUE

29 NOVEMBER 2022

DATE OF EXPIRY

28 NOVEMBER 2025

CERTIFIED SINCE

29 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark background.

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Recycling of aluminum scrap and production of wrought and cast alloys according to customer specification at Coldwater North and South facilities in Michigan (USA), plus central strategic and administrative functions managed by REAL ALLOY Headquarters in Ohio (USA).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	REAL ALLOY
ENTITY NAME	REAL ALLOY Coldwater North and South Facilities
CERTIFICATION SCOPE	Recycling of aluminum scrap and production of wrought and cast alloys according to customer specification at Coldwater North and South facilities in Michigan (USA), plus central strategic and administrative functions managed by REAL ALLOY Headquarters in Ohio (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">2 – 6 May 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 October 2022
AUDIT SCOPE	<p>The audit scope included the production and all operations at REAL ALLOY Coldwater North and South plants, and strategic and administrative functions at REAL ALLOY Headquarters.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- 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.

CERTIFICATION PERIOD	29 November 2022 – 28 November 2025
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	28 May 2024
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CERTIFICATE NUMBER	232
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member (since November 2019) in the Production and Transformation membership class and has committed to ASI's membership obligations. Membership status can be verified at the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/real-alloy
1.2 Management system	Conformance	The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard.
1.3 Management system reviews	Conformance	The Entity has implemented a Management System that establishes the requirements for periodic review, at least every three years, and also periodically updates based on implementation experience to address potential areas of non-conformance.
1.4 Management representative	Conformance	The Entity has nominated the Corporate Sustainability Manager as the Management Representative with overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities.
1.6 Record keeping	Conformance	The Entity has implemented a Management System and processes to maintain up to date records addressing all applicable requirements of the ASI Chain of Custody Standard and retain them for a minimum of five (5) years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has implemented a Management System with requirements to report the following information to the ASI Secretariat within three months after the end of each calendar year: Input and Output Quantities of CoC Material in the calendar year.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has implemented a Management System with requirements to report the following information to the ASI Secretariat within three months after the end of each calendar year: Input Percentage calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has implemented a Management System with requirements to report the following information

CRITERION	RATING	COMMENT
		to the ASI Secretariat within three months after the end of each calendar year: the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has implemented a Management System with requirements to report the following information to the ASI Secretariat within three months after the end of each calendar year: the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has implemented a Management System with requirements to report the following information to the ASI Secretariat within three months after the end of each calendar year: total Input Quantity of Eligible Scrap, with a breakdown by Post-Consumer Scrap and Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity, in the calendar year.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity has implemented a Management System with requirements to report the following information to the ASI Secretariat within three months after the end of each calendar year: quantity of ASI Aluminium allocated to ASI Credits in the calendar year.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The quantity of ASI Aluminium allocated to ASI Credits is defined as information required to be submitted to the ASI Secretariat regularly, in the Entity's 'ASI CoC Standard management guideline'. However, to date, the Entity has no plan to purchase ASI Credits.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
2.5 Error management	Not Applicable	This Criterion is not applicable as the Entity has no applicable Outsourcing Contractors.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope - Aluminium Re-Melting/Refining	Conformance	The Entity has implemented a Management System with requirements that for delivered material to be considered ASI Liquid Metal, it must come from a Facility that is within the Entity's CoC Certification Scope, or in which Real Alloy holds a legal interest and is within the CoC Certification Scope of another CoC Certified Entity.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Conformance	The Entity has implemented a Management System with requirements that for delivered material to be considered ASI Liquid Metal, it must originate from a facility that is certified against the ASI Performance Standard.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has implemented a Material Accounting System with requirements to account for Eligible Scrap as only Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity, or Aluminium recovered from Dross and treated Dross residues that are subject to supplier due diligence.
4.2b Post-Consumer Scrap	Conformance	The Entity has implemented a Material Accounting System with requirements to account for Eligible Scrap as only Post-Consumer Scrap that is subject to

CRITERION	RATING	COMMENT
		supplier due diligence and is assessed by the Entity to be post-consumer in origin.
4.3a Supplier records	Conformance	The Entity has implemented a system with requirements to record the identity, principal contacts, and place(s) of operation of all direct suppliers of Recyclable Scrap Material.
4.3b Cash payments	Conformance	The Entity has implemented a system to monitor all financial transactions with direct suppliers of Recyclable Scrap Material, ensuring that cash payments are within the lower of the relevant defined financial threshold under Applicable Law or USD10,000 (or equivalent), where the transaction is undertaken in a single operation or in several operations that appear to be linked.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Conformance	The Entity has implemented a Management System with requirements for ensuring that ASI Aluminium is produced only from Casthouses that are within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
5.1b ASI Performance Standard - Casthouses	Conformance	The Entity has implemented a Management System with requirements for ensuring that ASI Aluminium is produced only from Casthouses that are certified against the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Entity's Material Accounting System ensures that unique identification numbers can be linked to the Input Quantity of CoC Material for that Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Sourcing ASI Aluminium	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has adopted and communicated to suppliers of Non-CoC Material and Recyclable Scrap Material a responsible sourcing Policy that addresses Anti-Corruption requirements. The Supplier Sustainability Policy can be accessed at:

CRITERION	RATING	COMMENT
		https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/Real_Alloy_NA_Supplier_Sustainability_Policy.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>The Entity has adopted and communicated to suppliers of Non-CoC Material and Recyclable Scrap Material a responsible sourcing Policy that addresses responsible sourcing requirements. The Supplier Sustainability Policy can be accessed at:</p> https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/Real_Alloy_NA_Supplier_Sustainability_Policy.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>The Entity has adopted and communicated to suppliers of Non-CoC Material and Recyclable Scrap Material a responsible sourcing Policy that addresses Human Rights Due Diligence requirements. The Supplier Sustainability Policy can be accessed at:</p> https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/Real_Alloy_NA_Supplier_Sustainability_Policy.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has adopted and communicated to suppliers of Non-CoC Material and Recyclable Scrap Material a responsible sourcing Policy that address Conflict-Affected and High-Risk Areas. The Supplier Sustainability Policy can be accessed at:</p> https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/Real_Alloy_NA_Supplier_Sustainability_Policy.pdf
7.2 Risk assessment	Conformance	<p>The Entity has implemented a Management System with requirements for assessing the risks of non-compliance with its Supplier Sustainability Policy by its suppliers of Non-CoC Material and Recyclable Scrap Material annually, documenting the findings, and undertaking measurable risk mitigation where risks of adverse impacts are identified.</p>
7.3 Complaints mechanism	Conformance	<p>The Entity has implemented a Management System with requirements for a Complaints Resolution Mechanism that is appropriate to the nature, scale and impact of the business and that allows interested parties to voice concerns about non-compliance with its responsible sourcing policy in its Aluminium supply chain. Direction to the complaints mechanism is available in the Sustainability Report and the Supplier Sustainability Policy:</p> https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf

CRITERION	RATING	COMMENT
		https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/Real_Alloy_NA_Supplier_Sustainability_Policy.pdf
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has implemented a Management System with requirements for recording Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass.
8.2a Post-Consumer Scrap	Conformance	It is a requirement of the Entity's CoC management guideline and CoC operation management procedure that the Input Quantity of Post-Consumer Scrap is input into the Entity's CoC material accounting sheet in its Production Control System.
8.2b Pre-Consumer Scrap (total)	Conformance	It is a requirement of the Entity's CoC operation management procedure that Input Quantity of Pre-Consumer recyclable Scrap is input into the Entity's CoC material accounting sheet in its Production Control System to record, report and document the material flow.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	It is a requirement of the Entity's CoC operation management procedure that the Input Quantity of Post-Consumer Scrap is input into the CoC material accounting sheet in its Production Control System to record, report and document the material flow.
8.3 Material Accounting Period	Conformance	The Material Accounting Period is regulated to be one year from January to December, as per the Entity's CoC management guideline and CoC operation management procedure.
8.4 Input Percentage	Conformance	The Input Percentage for the Entity's Material Accounting Period is automatically calculated and recorded in its CoC material accounting sheet, in accordance with the CoC management guideline and CoC operation management procedure.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Conformance	The Input Percentage associated with Aluminium Re-melting/Refining for the Entity's Material Accounting Period is calculated and recorded in its CoC material accounting sheet, in accordance with the CoC management guideline and CoC operation management procedure.
8.6 Output Quantity determination	Conformance	The Input Percentage for the Entity's Material Accounting Period is used to determine the Output Quantity of CoC Material by Mass Balance, as per the Entity's CoC management guideline and CoC material accounting sheet.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	Conformance	The Output Quantity of CoC Material is designated as 100% CoC Material in the Entity's CoC material accounting sheet.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity has no plan to produce Pre-Consumer Scrap. All materials are processed at the Entity's Casthouse.
8.9 Outputs not exceed Inputs	Conformance	It is a requirement that the total output of CoC Material does not proportionally exceed the Input Percentage as applied to total input of CoC Material and Eligible Scrap for the Material Accounting Period, as per the Entity's CoC management guideline and CoC material accounting sheet.
8.10a Internal Overdraws (not exceed 20%)	Conformance	It is a requirement that the Entity's Internal Overdraw does not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period, as per the CoC management guideline, even under force majeure situations. The Entity has an internal assessment procedure to assure conformance.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Material Accounting System allows for the carry over of an Internal Overdraw to the subsequent Material Accounting Period, where it does not exceed the amount of CoC Material under contract for delivery that may be affected by a force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	It is a requirement of the Entity's CoC management guideline that the Internal Overdraw resulting from a force majeure situation is made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's CoC material accounting sheet includes a field that captures the quantity of any carry over of a Positive Balance identified at the end of the Material Accounting Period.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System requires a Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period, to expire at the end of that period if not drawn down.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has established a Standard Operating Procedure for CoC Material with the appropriate documents. Responsibility of each related party is described in the Entity's CoC management guideline and detailed in the CoC operation management procedure.

CRITERION	RATING	COMMENT
9.2a Date of issue	Conformance	The Entity's Production Control System has a CoC Document template which is designed to include all required information, including date of issue. The required information for CoC Documents is described in the CoC operation management procedure.
9.2b Reference number	Conformance	The Entity's CoC Document template is designed to include a reference number for the CoC Document, linked to the Entity's Material Accounting System for verification purposes.
9.2c Issuing Entity	Conformance	The Entity's CoC Document template is designed to include the identity, address and CoC Certification number of the Entity issuing the CoC Document.
9.2d Receiving customer	Conformance	The Entity's CoC Document template is designed to include the identity and address of the customer receiving the CoC Material and, if it is another CoC Certified Entity, its CoC Certification number.
9.2e Responsible employee	Conformance	The Entity's CoC Document template is designed to include the responsible employee of the Entity who can verify information in the CoC Document.
9.2f Conformance statement	Conformance	The Entity's CoC Document template includes a statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard."
9.2g Type of CoC Material	Conformance	The Entity's CoC Document template is designed to include the type of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity's CoC Document template is designed to include the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity's CoC Document template is designed to include the mass of total material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	Sustainability Data is provided by the Entity in the CoC Document, according to its CoC operation management procedure and includes the average intensity of GHG Emissions (tonnes CO ₂ -eq per metric tonne ASI Aluminium); ASI Certification status of the CoC Material produced in the Material Accounting Period.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3c Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional)	Conformance	The Entity requires that any Supplementary Information about the Entity or CoC Material, where it

CRITERION	RATING	COMMENT
		exists, is supported with objective evidence, as prescribed in the CoC operation management procedure.
9.5 Response to verification requests	Conformance	The Entity's Quality Assurance Division has a responsibility to respond to reasonable requests, under the instruction of Quality Assurance Manager, who is appointed as the Management Representative of CoC management. All necessary information is available in the Entity's Production Control System.
9.6 Error management	Conformance	The Entity has an investigation and reporting requirement as part of its corrective/preventive action procedure that prescribes a requirement for root cause to be identified and control measures to be implemented if errors are identified after CoC Material shipment. The Entity has established an internal audit system to ensure that errors are identified and responded to in this way.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity had established a verification procedure to verify that all required information is included in received CoC Documents. The procedure is described in the CoC operation management procedure. The Purchasing Division of the Entity's Head Office holds the responsibility for the verification.
10.2 Verify consistency with shipments	Conformance	The Entity has established a verification procedure to verify the consistency of received CoC Documents with the accompanying CoC Material. The procedure is described in the CoC operation management procedure. The Quality Assurance Division has the responsibility for this verification before information is recorded in the Material Accounting System.
10.3 Verify supplier CoC Certification status	Conformance	The Entity had established a verification procedure to verify that all required information is included in received CoC Documents. The procedure is described in the CoC operation management procedure. The Purchasing Division of the Entity's Head Office holds the responsibility for the verification.
10.4 Error management	Conformance	The Entity has established an investigation and reporting requirement, as part of its corrective/preventive action procedure, that requires root causes to be identified and control measures implemented where errors are discovered after receiving CoC Material. This is prescribed in the CoC operation management procedure.

CRITERION	RATING	COMMENT
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not currently purchase ASI Credits nor does it plan to.

CRITERION	RATING	COMMENT
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	To date the Entity has not made any claims and/or representations about CoC Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates. Rules have been developed to ensure that such claims are consistent with the ASI Claims Guide, that verifiable evidence will be provided to support claims made and that training is provided for relevant employees to make such claims.
12.1b Verifiable evidence	Conformance	To date the Entity has not made any claims and/or representations about CoC Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates. Rules have been developed to ensure that such claims are consistent with the ASI Claims Guide, that verifiable evidence will be provided to support claims made and that training is provided for relevant employees to make such claims.
12.1c Employee training	Conformance	To date the Entity has not made any claims and/or representations about CoC Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates. Rules have been developed to ensure that such claims are consistent with the ASI Claims Guide, that verifiable evidence will be provided to support claims made and that training is provided for relevant employees to make such claims.

Document Control and Version History

Revision	Date	Notes
0	29 November 2022	Initial Certification Audit – Full Certification