

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Huanghe Xinye Co., Ltd

CERTIFICATE NUMBER

406

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CHINA QUALITY MARK
CERTIFICATION GROUP

DATE OF ISSUE

12 DECEMBER 2024

DATE OF EXPIRY

11 DECEMBER 2027

CERTIFIED SINCE

12 DECEMBER 2024

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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

Huanghe Xinye Co., Ltd. located in
Xining City, Qinghai Province
(China) with Liquid Aluminium and
Aluminium ingot production.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Huanghe Xinye Co., Ltd
ENTITY NAME	Huanghe Xinye Co., Ltd
CERTIFICATION SCOPE	Huanghe Xinye Co., Ltd. located in Xining City, Qinghai Province (China) with Liquid Aluminium and Aluminium ingot production.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	China Quality Mark Certification Group
AUDIT DATE	<ul style="list-style-type: none">10 - 12 July 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 October 2024
AUDIT SCOPE	<p>The Audit Scope included the production process of liquid Aluminium and Aluminium ingot production of Huanghe Xinye Co., Ltd. located in Xining City, Qinghai Province (China).</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 12 December 2024 – 11 December 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 11 December 2025

CERTIFICATE NUMBER 406



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

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

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

ENTITY OVERVIEW

Huanghe Xinye Co., Ltd. (the 'Entity') was established in September 2007 and is a wholly-owned subsidiary of Huanghe Hydropower Development Co., Ltd., which oversees the construction and operation of the joint hydropower and Aluminium project. Construction of the Entity's facilities commenced in March 2008, and the primary operational phases took place between 2009 and 2010, with a construction cost of approximately RMB 7.5 billion, over an area of over 133 hectares.

The Entity has a production capacity of 600,000 tonnes for Primary Aluminium and 300,000 tonnes for carbon anode, with a total number of over 1,700 employees. It includes nine functional departments, four production branches, and four functional centres. The closest residential area, Shangying Village, is located 1.5 kilometres away.

Key facilities comprise an Alumina warehouse, four electrolytic production plants, one casting plant, office buildings, dormitories, cafeterias, parking lots and warehouses. The Entity primarily sells its products within China, including markets in Shanghai and Jiangsu.

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.

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

	OVERALL
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	This Entity joined ASI as a member in Production and Transformation class. It complies with membership obligations and the complaint mechanism. In January 2024, the Entity was certified to the ASI Performance Standard. Membership details are available at: https://aluminium-stewardship.org/about-asi/members/Huanghe-Xinye-Co--Ltd
1.2 CoC Management System	Conformance	This Entity has developed documents, systems, procedures, and processes to comply with ASI Chain of Custody (CoC) requirements. CoC management activities are integrated into the Entity's broader Management Systems, including ASI performance, quality, environmental and Occupational Health and Safety (OH&S). The Entity has also allocated relevant resources, including financial, human and technological, to execute CoC tasks and activities.
1.3 CoC Management System Monitoring	Conformance	The Entity annually reviews its CoC management requirements, incorporating guideline updates and practical implementation insights, and addresses non-conformities and potential non-compliance. A Management System review was last conducted in May 2024.
1.4 Management Representative	Conformance	The Entity has designated a management representative for the CoC Management System. The responsibilities include organising internal communication and coordination on CoC issues, guiding reviews of the CoC Standard, and overseeing regular evaluations and improvements related to CoC activities.
1.5 Communications and Training	Conformance	The Entity has developed an annual ASI training plan to coordinate department training on ASI standards, including requirements, job responsibilities and procedures. Annual staff training was completed this May, with documentation including a sign-in form and an evaluation of training effectiveness.
1.6 Records Management	Conformance	The Entity's CoC management operation records comply with its CoC Management Manual, maintaining original feeding and production data in paper records or the Enterprise Resource Planning (ERP) system. These records are retained for five years, aligning with other Management System processes, ensuring they can be reviewed and traced as needed within this period.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Input and Output Quantities of CoC Material, to the ASI Secretariat by June 30, following the end of each calendar year. This Audit served as a preliminary CoC examination. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Input and Output Quantities of Eligible Scrap, to the ASI Secretariat by June 30, following

CRITERION	RATING	COMMENT
		the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Inflow and Outflow Quantities of Non-CoC Material, to the ASI Secretariat by June 30, following the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Positive Balance carried over to the subsequent Material Accounting Period, to the ASI Secretariat by June 30, following the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Positive Balance used to the ASI Secretariat by June 30, following the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Internal Overdraw drawn down, to the ASI Secretariat by June 30, following the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's CoC management procedures stipulate that it will report the required CoC material information including Intra-Entity Flows, to the ASI Secretariat by June 30, following the end of each calendar year. While the Entity is not yet required to report to the ASI Secretariat, it has met the conditions to do so.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has implemented a CoC system to ensure the production of ASI-Certified Aluminium. The production process involves utilising purchased Alumina to produce molten Primary Aluminium, which is then processed into Aluminium ingots. The scope of the Entity's ASI Performance Standard certification already encompasses all its Aluminium smelting facilities, and ASI certified Aluminium is produced exclusively at these facilities.
3.3b ASI Aluminium (Performance Standard)	Conformance	In January 2024, the Entity was certified against the ASI Performance Standard. All ASI Certified Aluminium produced by the Entity is manufactured exclusively in its own smelting facilities.
3.3c ASI Aluminium (Alumina sourcing)	Conformance	Although there are no current CoC transactions, the Entity's procurement process complies with ASI standards and the guidelines detailed in the ASI Management Manual and related procedural documents. Suppliers undergo Due Diligence and risk assessments to ensure compliance. The Entity's ASI Management Manual further stipulates that when procuring ASI Alumina directly from manufacturers or traders, it is crucial to confirm that the manufacturer possesses a valid ASI CoC Certificate. Additionally, each batch of Alumina must be accompanied by a valid CoC Document.
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established the ASI CoC Management System, which includes the remelt Aluminium ingot casting workshop which has also achieved ASI Performance Standard Certification, aligning with its ASI CoC Certification Scope, which encompasses the production of Aluminium ingots. The casting workshop uses molten Aluminium from the electrolysis workshop to produce remelt Aluminium ingots. All facilities involved in the production of Aluminium ingots are within the Entity's ASI CoC Certification Scope. The Entity operates without relying on external sourcing.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity has been certified against the ASI Performance Standard, aligning with the scope of its ASI CoC Certification, which includes the Aluminium ingot production process. The Entity's casting workshop uses molten Aluminium from the electrolysis workshop to produce remelt Aluminium ingots. All facilities involved in ingot production are included under the ASI CoC certification. The Entity operates without relying on external sourcing.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's casting workshop uses molten Aluminium from its electrolysis workshop to produce remelt Aluminium ingots. The facilities for ingot production are included in the ASI CoC Certification Scope. Currently, the Entity only uses self-produced molten Aluminium and does not source externally.
5.2 Unique Identification	Conformance	To ensure traceability, the Entity's Production Department establishes a Material Accounting and Identification System during casting. This System assigns a unique identification code to each ASI Product, indicating the production date, model, and batch number on the Aluminium ingot. It also tracks the ingot's circulation, including its proportion and quantity in the production report, and links these data to the CoC material input during the Material Accounting process.

CRITERION	RATING	COMMENT
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	<p>The Entity has developed a Supplier Code of Conduct to align with the Anti-Corruption requirements in the ASI Performance Standard, available at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691047633.pdf</p> <p>The Entity's Procurement Control and Anti-Bribery Procedures comply with ASI Policies and Responsible Procurement laws, covering Aluminium, Non-CoC Material, Recycled Scrap, and CoC Material. Policies are shared with suppliers via contracts, with pre-procurement evaluations focusing on quality and environmental, social, and governance (ESG) compliance. The December 2023 Supplier ASI Questionnaire also include Anti-Bribery assessments.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity has published its latest Responsible Procurement Policy on its website, available at: http://www.hhsd.com.cn/upload/files/2023-08-03/file_1691047660.pdf</p> <p>The Entity conducts an annual reevaluation of its suppliers, focusing on ESG risks to ensure compliance with its ASI Policy requirements. The procurement of key raw materials, including Alumina and Aluminium fluoride, is primarily managed by its Enterprise Group. The Entity collaborates with State Power Investment Group Aluminium International Trade Co., Ltd. to evaluate suppliers, ensuring they meet qualification and evaluation standards. In December 2023, the Entity reviewed the 'Supplier Evaluation Form' and conducted evaluations for two Alumina suppliers (non-CoC material) and one Aluminium fluoride supplier.</p>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has implemented a procurement Policy to ensure Human Rights Due Diligence, including risk assessment, mitigation, and Complaint Mechanisms for Aluminium supply chain risks. Suppliers are thoroughly evaluated under a Procurement Control Procedure, with contracts covering Anti-Bribery, Human Rights, and environmental standards. Human Rights Due Diligence prevents rights abuses and displacement, and dealings with suppliers involved in violations are terminated. Procedures are reviewed annually, with no issues currently reported.</p>

CRITERION	RATING	COMMENT
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has established a procurement Policy and distribution process for its employees, including assessments of potential Conflict-Affected and High-Risk Areas (CAHRAs). It follows a Procurement Control Procedure, conducting investigations and evaluations of suppliers before procurement. The Entity does not engage suppliers located within CAHRAs.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has developed a Responsible Procurement Framework, including risk assessment and validation for direct (Level I) suppliers of Non-CoC and CoC Materials. Findings are recorded, and mitigation strategies are applied. Procurement is predominantly managed by the Entity's Enterprise Group, with the Entity collaborating with State Power Investment Group Aluminium International Trade Co., Ltd. Suppliers are evaluated annually through audits and self-assessments to assess compliance with procurement Policies. Due Diligence, including supplier prequalification and risk assessment, was completed in December 2023, which only identified low risks.
7.3 Complaints Resolution Mechanism	Minor Non-Conformance	The Entity has established a mechanism to address ASI-related complaints and concerns, including collecting, handling, responding to, and following up on them. A dedicated hotline and email address are available for complaints and information requests. However, access to these contacts is currently not publicly available.

8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System to track the input and output of CoC Material and Non-CoC Material within its Certification Scope. This System also monitors the input, output, internal flow of Eligible Scrap, as well as the movement of CoC and Non-CoC Materials across supply chain activities, ensuring quality balance integrity between CoC materials and qualified waste.
8.2 Material Accounting Period	Conformance	The Entity's ASI CoC Management Manual specifies that the Accounting Period runs from January to December each year, aligning with the ASI Material Balance Calculation Table, which also uses the calendar year for statistical purposes.
8.3 Input and Inflow Quantities	Conformance	The Entity tracks the quantities of CoC Material, Eligible Scrap Input, the Quantity of Non-CoC Material and Recyclable Scrap during the Material Accounting Period. The inflow of Eligible and Recyclable Scrap is determined based on Aluminium content assessment.
8.4 Output Quantities of CoC Material	Conformance	During the Material Accounting Period, the Entity calculates the CoC Material Output based on the percentage of CoC Material Input relative to the total mass of CoC and Non-CoC Material inflows.
8.5 Indivisibility of CoC Material	Conformance	The Entity's ASI Management Manual specifies that the Output Quantities of CoC materials, which may constitute only a portion of total production, shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's ASI Management Manual specifies that the percentage of ASI Aluminium and Eligible Scrap Output must match the Input percentage, ensuring that Scrap generated during production is properly designated.

CRITERION	RATING	COMMENT
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's ASI Management Manual stipulates that the Output of CoC Material and Eligible Scrap does not exceed their proportional Input.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's ASI Management Manual mandates that Internal Overdraws shall not exceed 20% of total CoC Material Input during the Accounting Period. In 2023, the Entity had no Overdraws recorded.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has specified in its ASI Management Manual that internal Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's ASI Management Manual stipulates that any Internal Overdraw shall be made up within the subsequent Material Accounting Period, which did not occur in 2023.
8.9a Positive Balance (Carry over)	Conformance	The Entity's ASI Management Manual stipulates that any Positive Balance of CoC Material at the end of an Accounting Period may be carried over to the subsequent Period. The Material Accounting System identifies and marks any carry over of a Positive Balance.
8.9b Positive Balance (Expiry)	Conformance	The Entity's ASI Management Manual states that any Positive Balance carried over to the subsequent Accounting Period shall expire at the end of the year if not drawn down.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity's ASI Management Manual stipulates that a CoC Document accompanies each shipment or transfer of CoC Material to certified Entities or Traders. The Entity will use the CoC Document template recommended in the ASI Chain of Custody Standard for this purpose. No CoC Material has been shipped to other Entities.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's ASI Management Manual stipulates that the CoC Document shall include the Date of issue. The Entity will issue CoC Documents for each batch of CoC Material/Product using the ASI CoC Document template, and all CoC Documents will include the issue date. No CoC Material has been shipped to other Entities.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's ASI Management Manual stipulates that CoC Document Reference numbers are linked to the Entity's Material Accounting System for traceability and verification. Currently, no CoC Material has been delivered to other Entities.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's ASI Management Manual stipulates that CoC Documents must include the unit name, address, and CoC Certificate number. The Entity will publish a CoC Document for each batch of Material/Product using the ASI CoC template. All issued CoC Documents will contain the Entity's identity, address, and CoC authentication number. No CoC Material has been delivered to other Entities.

CRITERION	RATING	COMMENT
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's ASI Management Manual specifies that the CoC Document shall include the customer's name and address, along with the CoC authentication number if the customer has received CoC Certification. The Entity will use the CoC file template defined in the ASI Chain of Custody Standard for each Material/Product batch. For other CoC Certified Entities, all issued CoC Documents shall include the customer's name, address, and CoC authentication number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's ASI Management Manual specifies that the CoC Document must include the Entity's representative responsible for verifying its information before it is sent to the customer. CoC Documents for each batch of Material/Product will be created using the ASI CoC template and reviewed and approved by the Sales Head before distribution.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's ASI Management Manual specifies that all issued CoC Documents must include a statement confirming that 'The information provided in the CoC Document is in Conformance with the ASI CoC Standard.'
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's ASI Management Manual stipulates that all CoC Documents specify the type of Material in the shipment. CoC Document will be included for each batch of Material or Product using the ASI CoC template.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's ASI Management Manual stipulates that all CoC Documents specify the Mass of CoC Material shipped. CoC Document shall be included for each batch of CoC Material/Product using the ASI CoC template. All issued CoC Documents will include details of the shipped CoC Material.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's ASI Management Manual stipulates that all CoC Documents shall include the Mass of total material shipped. CoC Documents for each batch of CoC Material/Product will be included using the ASI CoC Document template.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's ASI Management Manual stipulates that CoC Documents shall include relevant Sustainability Data, such as the average carbon footprint of CoC Material and the accounting method. The Entity has obtained a carbon footprint certification, detailing the carbon footprint and accounting methods for CoC Material.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity's ASI Management Manual stipulates that CoC Documents shall include relevant Sustainability Data, such as information on the source of Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity's ASI Management Manual stipulates that any Supplementary Information in the CoC Document be supported by Objective Evidence.
9.5 Verification of Information	Conformance	The Entity's ASI Management Manual specifies that the Entity is responsible for responding to information verification requests in the CoC Document by providing verification support to relevant parties. To facilitate this, the Entity has developed the CoC Document Information Validation Procedure for handling reasonable requests to verify information in the CoC Document.
9.6 Error (Shipping)	Conformance	The Entity has implemented a Quality Management System which is certified to ISO 9001 and requires that any errors be analysed for root causes, with corrective actions implemented to prevent recurrence.

10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has developed standard procedures to verify the information in the received CoC Document and assigned responsibility for this verification. No CoC Material has been received.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity's ASI Management Manual specifies that upon receiving CoC Material and Documents, the CoC Documents must be verified for consistency with the accompanying CoC Material or Eligible Scrap.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established procedures to verify vendors' ASI CoC Certification status. Its Supply Centre checks the ASI website quarterly for updates.
10.4 Error (Reception)	Conformance	To comply with the Entity's ASI Performance and Quality Management System, the Entity will analyse error causes and implement corrective actions to prevent recurrence. To date, no errors have occurred.

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity's ASI Management Manual requires all claims to adhere to ASI Claims Guide, clearly defining relevant responsibilities and permissions.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Documentation and Declaration procedures are outlined in the Entity's ASI CoC Management Manual, in alignment with the ISO 9001 Quality Management System, to ensure records are verifiable and compliant with ASI relevant requirements.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has developed procedures to provide standardised training for employees in line with established requirements. The ASI training plan for 2024 has been formulated, the annual training was reviewed and completed in May, with attendance records and training effectiveness evaluations retained.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at

all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 December 2024	Initial Certification Audit – Full Certification
