

ASI CERTIFICATION
CHAIN OF CUSTODY
STANDARD



PRESENTED TO

**ANHUI MAXIMUM
ALUMINIUM
INDUSTRIES CO., LTD.**

CERTIFICATE
NUMBER

130

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

19 APRIL 2021

DATE OF EXPIRY

18 APRIL 2024

CERTIFIED SINCE

19 APRIL 2021

AUTHORISED BY

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

Anhui Maximum Aluminium Industries Co., Ltd.
located in No. 88, Yinghua West Road, Suixi
Economic Development Zone, Anhui Province, China.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd.
ENTITY NAME	Anhui Maximum Aluminium Industries Co., Ltd.
CERTIFICATION SCOPE	Anhui Maximum Aluminium Industries Co., Ltd. located in No. 88, Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">• 29 – 30 March 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 6 April 2021
AUDIT SCOPE	<p>Anhui Maximum Aluminium Industries Co., Ltd. is located in No. 88, Yinghua West Road, Suixi Economic Development Zone, Anhui Province, China. The main product is High Precision Aluminium Strip and main production processes include remelting and casting, cold rolling and finishing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Post-Casthouse <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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- 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 19 April 2021 – 18 April 2024

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 18 October 2022

CERTIFICATE NUMBER 130

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an active ASI Member committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category. https://aluminium-stewardship.org/about-asi/asi-members/jiangsu-zhongji-lamination-materials-co-ltd
1.2 Management system	Conformance	The Entity has established policies, systems, procedures and processes that comply with ASI CoC criteria regarding a management system. The Management System has the capacity to manage ASI CoC material. The Entity has an integrated management system underpinned by ISO 9001. The Entity's ISO 9001 certificate was issued by CFL and is valid in the certification period.
1.3 Management system reviews	Conformance	The Entity established a process to review at least once every 12 months the Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance/improvement. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 quality management system.
1.4 Management representative	Conformance	Senior management member has nominated the Vice General Manager as the ASI Management Representative to have overall responsibility of the implementation of ASI CoC and for the conformance with all applicable requirements of the CoC 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 under the CoC Standard.
1.6 Record keeping	Conformance	The Entity establishes the record management procedure based on ISO 9001 management system procedure to maintain records (Management System) covering all applicable requirements of the CoC Standard including the retention requirement of ASI records.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Not applicable for the first Certification Audit.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Not applicable for the first Certification Audit.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Not applicable for the first Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Not applicable for the first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Not applicable for the first Certification Audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
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.

CRITERION	RATING	COMMENT
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Conformance	The observed system ensures production of ASI Aluminium only from the Casthouse that is within the Entity's CoC Certification Scope.
5.1b ASI Performance Standard - Casthouses	Conformance	The observed system ensures production of ASI Aluminium only from the Casthouse Certified against the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Entity has systems in place to ensure that unique identification numbers, either physically stamped or printed on ASI Aluminium products or their packaging, can be linked to the Material Accounting System. The Material Accounting System on the Casthouse site of the Entity is ready and has been tested.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		

CRITERION	RATING	COMMENT
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The observed system ensures production of ASI Aluminium only from the facilities that is within the Entity's CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity has system in place to ensure that it produce ASI Aluminium only from the Entity certified facilities against the ASI Performance Standard.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has systems in place to ensure that the ASI Aluminium is purchased only from the eligible Entities/facilities directly or indirectly via a metals trader and warehouse. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Responsible Sourcing Policy covers the anti-corruption. All identified major next tier suppliers are communicated with the policy, signed Commitment Letters of Business Ethics are signed by the suppliers. The responsible sourcing policy is published on: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has a Responsible Purchasing Policy, covering the ASI CoC criteria of responsible purchasing sourcing. All major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The Responsible Purchasing Policy is published on: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has a Responsible Purchasing Policy, covering the ASI CoC criteria of Human Rights Due Diligence. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The Responsible Purchasing Policy is published on: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has a Responsible Sourcing Policy which addresses conflict affected and high-risk areas. The relevant training course are provided to employees. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Non-Conflict-Mineral. The Responsible Purchasing Policy is published on: http://www.maxalu.com/upload/file/20200928/20200928231803.pdf

CRITERION	RATING	COMMENT
7.2 Risk assessment	Conformance	The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts where relevant. The Entity also conducts second party audits of its major next tier suppliers.
7.3 Complaints mechanism	Conformance	The Entity has a complaints mechanism that meets the requirements of the ASI Performance Standard Criterion 3.2. The Entity has a Whistleblower/Complaint channel to enable employees and external stakeholders to report anonymously potential misconducts. The channel: hotline: +86-561-7976888, mailbox: 279055256@qq.com is provided to all stakeholders. The information can be reached via: http://www.maxalu.com/down/down.php?id=38
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that can record Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass which will conform to ASI CoC requirement. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.2a Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Material Accounting Period is defined as 12 months, in accordance with the Entity's financial year.
8.4 Input Percentage	Conformance	The method for calculating and recording the percentage of the CoC Material is defined in the Material Accounting System in compliance with ASI CoC requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	Output Quantity determination is defined in the Material Accounting System procedures and processes. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	Conformance	The Entity's output quantity can be designated as 100% CoC material as per Material Accounting System procedures and processes. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	Each transfer of the eligible pre-customer scraps from the Entity shall be accompanied with CoC document, the calculation of the percentage shall follow the formula defined in ASI CoC Standard. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.9 Outputs not exceed Inputs	Conformance	The Entity's Material Accounting System is developed to provide updated information on inventory balance on a frequent basis to guarantee the Outputs do not exceed Inputs. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The requirement for Internal Overdraw not exceeding 20% of total Input Quantity of CoC Material for the Material Accounting Period is defined in the Material Accounting System. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity established a process in the Material Accounting system to control internal overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a process in the Material Accounting system to control internal overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.11a Positive Balance (carry over)	Conformance	The Entity has established a process in the Material Accounting system to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.11b Positive Balance (expiry)	Conformance	The Entity has established a process in the Material Accounting system to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.

CRITERION	RATING	COMMENT
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has a system that can produce CoC documents for shipment and transfer of CoC Material, ensuring that these are controlled, issued and stored as per ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2a Date of issue	Conformance	The Entity will issue a CoC document for each lot of material/product in the form defined in ASI CoC Standard, include date of issue. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2b Reference number	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include reference number: MAX+CoC + date code + lot number + version number. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of ASI CoC Material.
9.2c Issuing Entity	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include issuing Entity. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2d Receiving customer	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include receiving customer. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2e Responsible employee	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include responsible employee. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2f Conformance statement	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include conformance statement.
9.2g Type of CoC Material	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include type of CoC Material. At the time of

CRITERION	RATING	COMMENT
		the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2h Mass of CoC Material	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include mass of CoC material. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2i Mass of total material	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include mass of total material. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.3a Sustainability Data (optional)	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include sustainability data. The data is based on the GHG emission calculation report which is published on the Entity's official website. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.3b Sustainability Data (passing on)	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include sustainability data. The data is based on the GHG emission calculation report which is published on the Entity's official website. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include ASI certification status.
9.4 Supplementary Information (optional)	Conformance	The Entity has established, implemented, maintain a management system against ASI Performance Standard including GHG emission calculation and the information in CoC documents are based on the output of the ASI PS management system. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.5 Response to verification requests	Conformance	The Entity defines the responsibility and the process to respond the requests for verification of information in CoC Documents issued by the Entity. This was evidenced in the ASI CoC Management Manual.

CRITERION	RATING	COMMENT
9.6 Error management	Conformance	In conjunction with the ISO 9001 Quality Management System, the Entity has a process to record errors, analyze the root cause, take the associated correction action to prevent the reoccurrence. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 Quality Management System.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity implements the process to verify the required information in the received CoC documents as required by ASI Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual.
10.2 Verify consistency with shipments	Conformance	The Entity implements the process to verify the required information in the received CoC documents as required by ASI Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual.
10.3 Verify supplier CoC Certification status	Conformance	The Entity implements the developed process to verify the supplier CoC Certification status. This was evidenced in the ASI CoC Management Manual.
10.4 Error management	Conformance	Integrated with ISO 9001 Quality Management System, the Entity has a process to record the errors, analyze the root cause, take the associated correction action to prevent the reoccurrence with suppliers. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 quality management system.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System - allocation	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.1d No Positive Balance of ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.

CRITERION	RATING	COMMENT
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3a CoC Certification Scope - purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3b Material Accounting System - purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.
11.3g Five year maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity's ASI CoC Management Manual defines all claims and communications shall follow the ASI Claims Guide including communication with ASI Secretariat, and the relevant roles and responsibilities are defined. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
12.1b Verifiable evidence	Conformance	The Entity appoints roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
12.1c Employee training	Conformance	The Entity provides relevant training courses on Claims and Communication to relevant employees.

Document Control and Version History

Revision	Date	Notes
0	19 April 2021	Initial Certification Audit – Full Certification