
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SHANDONG NANSHAN ALUMINIUM

CERTIFICATE
NUMBER

18

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

15 FEBRUARY 2019

DATE OF EXPIRY

14 FEBRUARY 2022

CERTIFIED SINCE

15 FEBRUARY 2019

AUTHORISED BY

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

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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

Yantai Donghai Aluminium Foil Co., Ltd. is a subsidiary of Shandong Nanshan Aluminium Co. Ltd. and located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China. The main products cover high-precision aluminium and aluminium alloy foils.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Shandong Nanshan Aluminium Co. Ltd.
ENTITY NAME	Yantai Donghai Aluminium Foil Co., Ltd.
CERTIFICATION SCOPE	Yantai Donghai Aluminium Foil Co., Ltd. is a subsidiary of Shandong Nanshan Aluminium Co. Ltd. and located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China. The main products cover high-precision aluminium and aluminium alloy foils.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	28 – 30 January 2019
AUDIT REPORT SUBMISSION	2 February 2019
AUDIT SCOPE	<p>The audit scope covered the Yantai Donghai Aluminum Foil Co., Ltd. a subsidiary of Shandong Nanshan Aluminium Co. Ltd. and located in Nanshan Industrial Zone, Longkou, Yantai City, Shandong Province, China, for the production and sale of high-precision aluminium and aluminium alloy foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-casthouse (this includes Semi-Fabricators, Material Conversion, and other Manufacturing or sale of products containing aluminium) <p>Relevant criteria from 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	15 February 2019 – 14 February 2022
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	15 August 2020
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CERTIFICATE NUMBER	18
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Donghai Aluminium Foil is in the Production and Transformation category. Its parent company: Shandong Nanshan Aluminium Co., Ltd. holds an ASI Membership. Shandong Nanshan Aluminium Co., Ltd (parent company of the Entity) is an active ASI member. https://aluminium-stewardship.org/about-asi/asi-members/shandong-nanshan-aluminium-co-ltd/ .
1.2 Management system	Conformance	Donghai Aluminium Foil has an ASI CoC management system against ASI Chain of Custody Standard.
1.3 Management system reviews	Conformance	Donghai Aluminium Foil established a process to periodically review the Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance/improvement.
1.4 Management representative	Conformance	The Entity nominates General Engineer 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	Donghai Aluminium Foil delivers the training courses to relevant personnel to raise awareness of ASI CoC requirements and makes them know the implementation procedures.
1.6 Record keeping	Conformance	Donghai Aluminium Foil maintains up-to-date 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 first Certification Audit
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Not applicable for first Certification Audit
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Not applicable for first Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Not applicable for first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Not applicable.

CRITERION	RATING	COMMENT
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not applicable for first Certification Audit.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	Donghai Aluminium Foil does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	Donghai Aluminium Foil 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.
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.

CRITERION	RATING	COMMENT
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	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.1b ASI Performance Standard – Casthouses	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.2 Casthouse Products	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Donghai Aluminium Foil has systems in place to ensure that it is itself producing ASI Aluminium only from an Entity and/or Facility/ies.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Donghai Aluminium Foil is certified to the ASI Performance Standard Certificate. The certificate number is 17.
6.1c Sourcing ASI Aluminium	Conformance	The Entity's operating procedures and strategic plans with future ASI certified suppliers will secure the supply and production of ASI CoC materials.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Donghai Aluminium Foil has the anti-corruption policy, covering the ASI CoC criteria of anti-corruption. All major next tier suppliers receive communication about

CRITERION	RATING	COMMENT
		<p>the policy, and the Commitment Letters of Responsible Purchasing are signed by the suppliers.</p> <p>The anti-corruption policy is published and accessible via: http://www.nanshanqhj.com/news/?type=detail&id=244.</p>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>Donghai Aluminium Foil has the responsible purchasing policy, covering the environmental, social and governance aspects for the supplier. All major next tier suppliers receive communication about the policy, and the Commitment Letters of Responsible Purchasing are signed by the suppliers.</p> <p>The responsible purchasing policy is published and accessible via: http://www.nanshanqhj.com/news/?type=detail&id=244.</p>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>Donghai Aluminium Foil has the responsible purchasing policy, covering the ASI CoC criteria of Human Rights Due Diligence. All major next tier suppliers receive communication about the policy, and the Commitment Letters of Responsible Purchasing are signed by the suppliers.</p> <p>The responsible purchasing policy is published and accessible via: http://www.nanshanqhj.com/news/?type=detail&id=244.</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>Donghai Aluminium Foil has the mechanism to manage the minerals from conflict affected and high-risk area, covering the ASI CoC criteria of conflict affected and high-risk areas. The relevant training course are provided to employees. All major next tier suppliers receive communication about the policy, and the Commitment Letters of Non-Conflict-Mineral are signed by the suppliers.</p> <p>The Non-Conflict-Mineral policy is published and accessible via: http://www.nanshanqhj.com/news/?type=detail&id=244.</p>
7.2 Risk assessment	Conformance	<p>Donghai Aluminium Foil undertakes risk assessments of its suppliers and completes risk mitigation efforts where relevant. Donghai Aluminium Foil also conducts second party audits of its major next tier suppliers.</p>
7.3 Complaints mechanism	Conformance	<p>Donghai Aluminium Foil has a Whistleblower/Complaint channel to enable employees and external stakeholders to report anonymously potential misconducts. The channel is provided to all stakeholders.</p>

CRITERION	RATING	COMMENT
8.1 Material Accounting System	Conformance	Donghai Aluminium Foil establishes 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.
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 Donghai Aluminium Foil 's financial year.
8.4 Input Percentage	Conformance	Donghai Aluminium Foil establishes a 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 no ASI CoC material are available on the market.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.6 Output Quantity determination	Conformance	Donghai Aluminium Foil establishes a 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 no ASI CoC material are available on the market.
8.7 Output Quantity designation	Conformance	Donghai Aluminium Foil establishes a 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 no ASI CoC material are available on the market.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	Donghai Aluminium Foil establishes a 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 no ASI CoC material are available on the market.
8.9 Outputs not exceed inputs	Conformance	Donghai Aluminium Foil establishes a 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 no ASI CoC material are available on the market.

CRITERION	RATING	COMMENT
8.10a Internal Overdraws (not exceed 20%)	Conformance	Donghai Aluminium Foil establishes a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Donghai Aluminium Foil establishes a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
8.10c Internal Overdraws (period to make up)	Conformance	Donghai Aluminium Foil establishes a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
8.11a Positive Balance (carry over)	Conformance	Donghai Aluminium Foil establishes a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
8.11b Positive Balance (expiry)	Conformance	Donghai Aluminium Foil establishes a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	Donghai Aluminium Foil has a system that can produce the CoC documents to each shipment and transfer, 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 no ASI CoC material are available on the market.
9.2a Date of issue	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the date of issue is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.

CRITERION	RATING	COMMENT
9.2b Reference number	Conformance	In Chapter 9.5 of the Entity's ASI CoC Management Manual, the reference number of the CoC document is defined. Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the reference number is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2c Issuing Entity	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, The identity, address and CoC Certification number of the Entity are included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2d Receiving customer	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number are included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2e Responsible employee	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the responsible employee who can verify information is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2f Conformance statement	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard." is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2g Type of CoC Material	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the type of CoC Material in the shipment is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2h Mass of CoC Material	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, Mass of CoC Material in the shipment is included. At the time of the audit,

CRITERION	RATING	COMMENT
		there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.2i Mass of total material	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, Mass of total Material in the shipment is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.3a Sustainability Data (optional)	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the optional sustainable data is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.3b Sustainability Data (passing on)	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the optional sustainable data is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.3c Post-Casthouse ASI Certification status	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the post-Casthouse ASI Certification statue is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.4 Supplementary Information (optional)	Conformance	Donghai Aluminium Foil uses ASI CoC Document template in ASI CoC Standard, the complaint channel is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
9.5 Response to verification requests	Conformance	Donghai Aluminium Foil establishes the process and assigns the responsibility to response to the verification request.
9.6 Error management	Conformance	Donghai Aluminium Foil will integrate error management with its current processes under the ISO 9001 certified management system which appeared to be robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
10 Receiving CoC Documents		
10.1 Verify required information included	Conformance	At the time of the audit, effectiveness of the verification of received CoC documents could not be reviewed as no CoC material is available on the market. However,

CRITERION	RATING	COMMENT
		the process and responsibility are defined for the verification of the information on CoC Documents.
10.2 Verify consistency with shipments	Conformance	Donghai Aluminium Foil established processes and assigns the responsibility to verify the consistency with shipments. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material are available on the market.
10.3 Verify supplier CoC Certification status	Conformance	Donghai Aluminium Foil establishes the process and assigns the responsibility to verify the supplier CoC certification status, take the action accordingly.
10.4 Error management	Conformance	Donghai Aluminium Foil will integrate error management with its current processes under the ISO 9001 certified management system which appeared to be robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.1c No double counting	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2a Date of issue	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2b Reference number	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2d Receiving Entity	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2e Conformance statement	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3c Expiry	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3d No re-trading	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as Donghai Aluminium Foil does not intend to utilise the ASI market credits system.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Donghai Aluminium Foil appointed 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 no ASI CoC material are available on the market.
12.1b Verifiable evidence	Conformance	Donghai Aluminium Foil appointed 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 no ASI CoC material are available on the market.
12.1c Employee training	Conformance	Donghai Aluminium Foil provides the training courses on Claims and Communication to the relevant employees.