

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# XIAMEN XIASHUN ALUMINIUM FOIL CO., LTD.

CERTIFICATE  
NUMBER

43

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

16 AUGUST 2019

DATE OF EXPIRY

15 AUGUST 2022

CERTIFIED SINCE

16 AUGUST 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing. Xiashun has three production facilities, located at Headquarters: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, Sheet Plant: No. 8 Dingshan Road, Haicang District, Xiamen 361026, P.R. of China, Haicang Foil Plant 2. Haicang Foil Plant: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, and Huli Foil Plant: No. 65 & 67 Xinglong Road, Huli District, Xiamen 361006, P.R. of China.

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

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MEMBER NAME Xiamen Xiashun Aluminium Foil Co., Ltd.

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ENTITY NAME Xiamen Xiashun Aluminium Foil Co., Ltd.

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CERTIFICATION SCOPE Xiashun manufactures and sells foilstock, litho stock (CTP), light-gauge aluminium foil that is less than 10µm and lithium battery foil. The main processes include remelting and casting, hot rolling, cold rolling and finishing. Xiashun has three production facilities, located at Headquarters: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, Sheet Plant: No. 8 Dingshan Road, Haicang District, Xiamen 361026, P.R. of China, Haicang Foil Plant 2. Haicang Foil Plant: No. 388 Yangguang Road, Haicang District, Xiamen 361022, P.R. of China, and Huli Foil Plant: No. 65 & 67 Xinglong Road, Huli District, Xiamen 361006, P.R. of China.

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SUPPLY CHAIN ACTIVITIES

- Aluminium Re-melting / Refining
- Casthouses
- Post-Casthouse

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ASI STANDARD

- Chain of Custody Standard V1

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AUDIT TYPE

- Certification Audit

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AUDIT FIRM DNV GL

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AUDIT DATE 22 July – 24 July 2019

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AUDIT REPORT SUBMISSION 30 July 2019

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AUDIT SCOPE Remelting, casting, hot rolling, cold rolling and finishing (foilstock, litho stock (CTP), light-gauge aluminium foil), at the Haicang Foil Plant, Head Office, Huli Plant, Sheet Plant.

Supply chain activities included in the audit scope:

- Aluminium Re-melting / Refining
- Casthouses
- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

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AUDIT OUTCOME	<ul style="list-style-type: none"> <li>• Certification</li> </ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li>☑ 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.</li> <li>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	16 August 2019 – 15 August 2022
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	15 August 2021
CERTIFICATION NUMBER	43

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category and holds certification on the Performance Standard as well. <a href="https://aluminium-stewardship.org/about-asi/asi-members/xiamen-xiashun-aluminium-foil-co-ltd/">https://aluminium-stewardship.org/about-asi/asi-members/xiamen-xiashun-aluminium-foil-co-ltd/</a>
1.2 Management system	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. established policies, systems, procedures and processes that can comply with ASI CoC criteria regarding a management system. The management system we observed has the capacity to handle ASI CoC material. Xiamen Xiashun Aluminium Foil Co., Ltd. has an integrated management system underpinned by ISO 9001. The Entity's ISO 9001 certificate was issued by DNV GL and is valid for the certification period.
1.3 Management system reviews	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. has established mechanisms for the periodic review of the Management System, in line with their ISO 9001 certification.
1.4 Management representative	Conformance	The Entity has appointed a member of management as the responsible person for ASI CoC Standard implementation and defined roles and responsibilities to manage the Chain of Custody system.
1.5 Training	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. delivered training to relevant personnel to raise awareness of ASI CoC requirements this year. Xiamen Xiashun Aluminium Foil Co., Ltd. has further plans to implement training measures that make relevant personnel aware of and competent in their responsibilities under the CoC Standard, once ASI certified material is available.
1.6 Record keeping	Conformance	Xiamen Xiashun Aluminium Foil Co., Ltd. maintains up-to-date records (Management System) covering all applicable requirements of the CoC Standard. The Entity's record manager procedure defines the retention time as required by the ASI CoC Standard.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI

CRITERION	RATING	COMMENT
		Secretariat within 3 months after the end of each calendar year.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity's Chain of Custody Management Procedure specifies that the Entity will report required information of CoC Material to ASI Secretariat within 3 months after the end of each calendar year.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.3 Output Quantity	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.4 Verification and record-keeping	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.5 Error management	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		
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.
<b>4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL</b>		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	Liquid Metal is produced at Xiashun wholly-owned Plant which is included in the Entity's ASI CoC Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	Liquid Metal is produced at Xiashun wholly-owned Plant which is included in the Entity's ASI Performance Standard Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity Material Accounting System is designed to control and account for Eligible Scrap coming into the value chain. Pre-Consumer Scrap that is designated as CoC Material supplied directly from their wholly-owned Plant, which is included in the Entity's CoC Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	The criterion is not applicable as the Entity does not source any Post-Consumer Scrap.
4.3a Supplier records	Not Applicable	The criterion is not applicable as the Entity does not source any recyclable Scrap Material from suppliers.

CRITERION	RATING	COMMENT
4.3b Cash payments	Not Applicable	The criterion is not applicable as the Entity does not source any recyclable Scrap Material from suppliers.
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 an accounting system to link and trace the input quantity of CoC material.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The observed system ensures production of ASI Aluminium only from the Post-Casthouse 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 produces ASI Aluminium only from the Entity certified against the ASI Performance Standard.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has system in place to ensure that it produces ASI Aluminium only from the Entity certified against the ASI Performance Standard.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Xiashun developed a Suppliers Code of Conduct covering the ASI CoC criteria of anti-corruption. A copy of the Suppliers Code of Conduct can be found on the company's website: <a href="http://www.xiashun.com/envpubfile/ASI10.pdf">http://www.xiashun.com/envpubfile/ASI10.pdf</a>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established a supplier responsible sourcing framework including human rights due diligence. A copy of the Suppliers Code of Conduct can be found on the company's website: <a href="http://www.xiashun.com/envpubfile/ASI10.pdf">http://www.xiashun.com/envpubfile/ASI10.pdf</a>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established a supplier responsible sourcing framework including human rights due diligence. A copy of the Suppliers Code of Conduct can be found on the company's website: <a href="http://www.xiashun.com/envpubfile/ASI10.pdf">http://www.xiashun.com/envpubfile/ASI10.pdf</a>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has established a supplier responsible sourcing framework including assessment of conflict affected and high risk areas. A copy of the Suppliers

CRITERION	RATING	COMMENT
		Code of Conduct can be found on the company's website: <a href="http://www.xiashun.com/envpubfile/ASI10.pdf">http://www.xiashun.com/envpubfile/ASI10.pdf</a>
7.2 Risk assessment	Minor Non-Conformance	The Entity has established a supplier responsible sourcing framework including risk-assessment and qualification process. A copy of the Suppliers Code of Conduct can be found on the company's website: <a href="http://www.xiashun.com/envpubfile/ASI10.pdf">http://www.xiashun.com/envpubfile/ASI10.pdf</a> . The Entity has assessed the risks of non-compliance with its responsible sourcing policy by its Non-CoC Material suppliers, and identified the Non-Conformances on preventing forced labour, establishing EHS Policy etc. However, relevant risk mitigation to identify adverse impacts were not undertaken. One minor non-conformance was raised.
7.3 Complaints mechanism	Conformance	The Entity has established a complaint mechanism allowing to raise concerns through different channels, such as the company website: <a href="http://www.xiashun.com/envpubfile/ASI1.pdf">http://www.xiashun.com/envpubfile/ASI1.pdf</a>
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 requirements.
8.2a Post-Consumer Scrap	Not Applicable	Due to the quality management requirement, the Entity does not use post-consumer scrap.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has established a Material Accounting System that can record Input Quantity of the pre-consumer scrap by mass which will conform to ASI CoC requirements.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The quantity of the eligible scrap generated by its own manufacture processes will be recorded in the Material Accounting System. Due to the quality requirements of the product, it does not use any scrap from other companies.
8.3 Material Accounting Period	Conformance	The Material Accounting Period is defined as 12 months, a calendar year.
8.4 Input Percentage	Conformance	The Entity has established processes to calculate and record the Input percentage in compliance to the ASI CoC standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available.



CRITERION	RATING	COMMENT
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity has established processes to calculate and record the Input percentage of Aluminium Re-Melting/Refining in compliance to the ASI CoC standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
8.6 Output Quantity determination	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements to determine the output quantity. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
8.7 Output Quantity designation	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements, how to designate the output quantity of CoC Material is defined. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements, how to designate the output quantity of pre-consumer scrap I is defined. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
8.9 Outputs not exceed inputs	Conformance	The Entity 's accounting system has been developed to have updated information on inventory balance on a frequent basis which conforms to the ASI Chain of Custody Standard requirement. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established 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 was available in the Entity's supply chain.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established 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

CRITERION	RATING	COMMENT
		of the system as no ASI CoC material was available in the Entity's supply chain.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established 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 was available in the Entity's supply chain.
8.11a Positive Balance (carry over)	Conformance	The Entity has established 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 materials was available in the Entity's supply chain.
8.11b Positive Balance (expiry)	Conformance	The Entity has established 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 was available in the Entity's supply chain.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has a system that can compile 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 was available in the Entity's supply chain.
9.2a Date of issue	Conformance	The Entity 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 was available in the Entity's supply chain.
9.2b Reference number	Conformance	The Entity 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 was available in the Entity's supply chain.
9.2c Issuing Entity	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, Xiamen Xiashun Aluminium Foil Co., Ltd is the issuing Entity. At the time of the audit,

CRITERION	RATING	COMMENT
		there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.2d Receiving customer	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the information of 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 was available in the Entity's supply chain.
9.2e Responsible employee	Conformance	The Entity 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 was available in the Entity's supply chain.
9.2f Conformance statement	Conformance	The Entity 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 was available in the Entity's supply chain.
9.2g Type of CoC Material	Conformance	The Entity uses the ASI CoC Document template in ASI CoC Standard, the types of CoC Materials in the shipment are included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.2h Mass of CoC Material	Conformance	The Entity uses ASI CoC Document template in the ASI CoC Standard, the mass of CoC Material is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.2i Mass of total material	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the mass of total Material is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.

CRITERION	RATING	COMMENT
9.3a Sustainability Data (optional)	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the optional sustainability data is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.3b Sustainability Data (passing on)	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the optional sustainability data is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the optional sustainability data is included. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.4 Supplementary Information (optional)	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, there is a column for supplementary information in the document template, the Entity can provide the supplementary information per the requirements from customer. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.5 Response to verification requests	Conformance	The Entity established processes and assigns the responsibility for responding the verification of information in CoC Documents issued by the Entity. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.6 Error management	Conformance	The Entity will integrate error management with its current processes under ISO 9001 to deal with the error and prevent it from re-occurrence.
<b>10 RECEIVING COC DOCUMENTS</b>		
10.1 Verify required information included	Conformance	The Entity establishes the process and responsibility for the verification of the information on received CoC Documents. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC materials was available in the Entity's supply chain.

CRITERION	RATING	COMMENT
10.2 Verify consistency with shipments	Conformance	The Entity established processes and assigns the responsibility for the verification the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
10.3 Verify supplier CoC Certification status	Conformance	The Entity appeared to have planned robust processes to ensure suppliers have a valid ASI certificate and trigger adequate processes if any changes occur to their status. The process will be managed by supply Department.
10.4 Error management	Conformance	The Entity will integrate error management with its current processes under ISO 9001 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 The Entity does not intend to utilize the ASI Market Credits System.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.1c No double counting	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2a Date of issue	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2b Reference number	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2c Issuing Entity	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2d Receiving Entity	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2e Conformance statement	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.

CRITERION	RATING	COMMENT
11.2f ASI Credits statement	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.2g Quantity	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3c Expiry	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3d No re-trading	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3e No allocation to physical products	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as The Entity does not intend to utilize the ASI Market Credits System.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Conformance	The responsibility of claims and communication is defined, and the process of claims and communication is defined to follow the ASI Claims Guide.
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 no ASI CoC material was available on the Entity's supply chain.
12.1c Employee training	Conformance	The Entity provides training courses on Claims and Communication to relevant employees.