

ASI CERTIFICATION
CHAIN OF CUSTODY
STANDARD



PRESENTED TO

**JIANGSU ZHONGJI
LAMINATION
MATERIALS CO.,
LTD**

CERTIFICATE
NUMBER

44

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

4 SEPTEMBER 2019

DATE OF EXPIRY

3 SEPTEMBER 2022

CERTIFIED SINCE

4 SEPTEMBER 2019

AUTHORISED BY

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

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](http://www.aluminium-
stewardship.org)*

CERTIFICATION SCOPE

Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd.
ENTITY NAME	Jiangsu Zhongji Lamination Materials Co., Ltd.
CERTIFICATION SCOPE	Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.
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	30 July – 1 August 2019
AUDIT REPORT SUBMISSION	13 August 2019
AUDIT SCOPE	<p>Jiangsu Zhongji Lamination Materials Co., Ltd. is located in Lingang New City Development Zone, Jiangyin City, Jiangsu Province, China. Mainly produces aluminium and aluminium alloy foil.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <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.<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 4 September 2019 – 3 September 2022

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 3 September 2021

CERTIFICATION NUMBER 44

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an active ASI Member, commits 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 established policies, systems, procedures and processes that can comply with ASI Chain of Custody (CoC) criteria regarding a management system. The management system has the capacity to handle ASI CoC material. The Entity has an integrated management system underpinned by ISO 9001. The Entity's ISO 9001 certificate was issued by China Quality Certification Centre and is valid for the certification scope and period.
1.3 Management system reviews	Conformance	The Entity established a process to periodical 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 nominated a senior management member 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 delivers the training courses to relevant personnel to raise awareness of ASI CoC requirements and make them 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 procedures 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	The audit is the first Certification Audit.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	The audit is the first Certification Audit.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	The audit is the first Certification Audit.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	The audit is the first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The audit is the first Certification Audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The audit is the first Certification Audit.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The audit is the first Certification Audit.
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.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	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	The Entity has systems in place to ensure that it is producing ASI Aluminium in its certification scope. 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.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The relevant suppliers are asked to declare if they have ASI Performance Standard Certification and the certification scope covers the products purchased.

CRITERION	RATING	COMMENT
6.1c Sourcing ASI Aluminium	Conformance	The Entity has systems in place to ensure that the ASI Aluminium is purchased only from 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 no ASI CoC material was available in the Entity's supply chain.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The responsible sourcing policy covers anti-corruption. All identified major next tier suppliers are communicated about the policy, and have signed Commitment Letters of Business Ethics. The responsible sourcing policy is published on: http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has a responsible sourcing policy, covering the ASI CoC criteria of anti-corruption. All major next tier suppliers are communicated about the policy and have signed the Commitment Letters of Responsible Purchasing. The Whistleblower/complaint channel are: hotline: +86-0510-80128303 mail box: zhengyan123@163.com . The responsible purchasing policy is published on: http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has a responsible sourcing policy, covering the ASI CoC criteria of Human Rights Due Diligence. All identified major next tier suppliers are communicated about the policy and have signed the Commitment Letters of Responsible Purchasing. The responsible purchasing policy is published on: http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has a responsible sourcing policy that covers conflict affected and high-risk areas. The relevant training course is provided to employees. All identified major next tier suppliers are communicated about the policy and have signed the Commitment Letters of Non-Conflict-Mineral. The responsible purchasing policy is published on: http://www.zjalufoil.com/WebEditor/upload/download/20190612022045.pdf
7.2 Risk assessment	Conformance	The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts where

CRITERION	RATING	COMMENT
		relevant. The Entity also conducts second party audits of its major next tier suppliers.
7.3 Complaints mechanism	Conformance	The Entity has a Whistleblower/Complaint channel to enable employees and external stakeholders to report anonymously, potential misconducts. The channel is provided to all stakeholders.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity established a Material Accounting System that can record Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass which conforms 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, a calendar year.
8.4 Input Percentage	Conformance	The Entity established a process to calculate and record the input percentage in compliance with 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.
8.5 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	The Entity 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 established a Material Accounting System in compliance with ASI CoC requirements, defining how to designate the output quantity of CoC Material. 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
8.8 Output Quantity – Pre-Consumer Scrap	Minor Non-Conformance	<p>The Entity established a Material Accounting System, and the pre-consumer scrap will be designated the relevant proportion as Eligible Scrap.</p> <p>One minor non-conformance is issued: The process does not clearly define how to determine the Output Quantity of Eligible Scrap for the given Material Accounting Period.</p>
8.9 Outputs not exceed inputs	Conformance	The Entity's accounting system was 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 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 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.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity 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 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.
8.11b Positive Balance (expiry)	Conformance	The Entity 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.

CRITERION	RATING	COMMENT
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 the 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 the 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 the ASI CoC Document template in ASI CoC Standard. Jiangsu Zhongji Lamination Material Co., Ltd. is the issuing 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.
9.2d Receiving customer	Conformance	The Entity uses the 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 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.
9.2e Responsible employee	Conformance	The Entity uses the 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 the ASI CoC Document template in ASI CoC Standard, the statement confirming that "The information provided in the CoC Document is in

CRITERION	RATING	COMMENT
		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 the ASI CoC Document template in 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 the 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.
9.3a Sustainability Data (optional)	Not Applicable	The Entities does not engage in Aluminium Smelting, and/or Aluminium Re-Melting/Refining, or operates a Casthouse.
9.3b Sustainability Data (passing on)	Conformance	The Entity uses A the SI 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 was available in the Entity’s supply chain.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity uses the ASI CoC Document template in ASI CoC Standard, the ASI Certification status for the ASI Performance Standard for the Entity 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 the ASI CoC Document template in the 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. In

CRITERION	RATING	COMMENT
		the ASI CoC Management Manual, the Entity requires all information shall be is consistent with information generated within the ASI Performance Standard and is reliable. 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 establishes the process and assigns the responsibility to respond to the verification request.
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.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity established 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 are available in the Entity's supply chain.
10.2 Verify consistency with shipments	Conformance	The Entity established processes and assigns the responsibility for the verification and 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 are available in the Entity's supply chain.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has 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 System 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 utilise the ASI Market Credits System.

CRITERION	RATING	COMMENT
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 for 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.
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 years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI Market Credits System.

CRITERION	RATING	COMMENT
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 no ASI CoC material is available on the Entity's supply chain.
12.1b Verifiable evidence	Conformance	The Entity 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 is available on the Entity's supply chain.
12.1c Employee training	Conformance	The Entity provided the training courses on claims and communication to the relevant employees.