

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SUNTOWN TECHNOLOGY GROUP CORPORATION LIMITED

CERTIFICATE
NUMBER

54

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

14 NOVEMBER 2019

DATE OF EXPIRY

13 NOVEMBER 2022

CERTIFIED SINCE

14 NOVEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Ho', written over a white background.

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

Suntown Technology Group Corporation Limited
including the aluminium casthouse, re-melting,
refining and material conversion activities
associated with the manufacture of aluminium foil
at the sites in Changsha and Changde (China).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Suntown Technology Group Corporation Limited
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	Suntown Technology Group Corporation Limited including the aluminium casthouse, re-melting, refining and material conversion activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• 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	TÜV Rheinland CERT GMBH
AUDIT DATE	10 – 11 October 2019
AUDIT REPORT SUBMISSION	31 October 2019
AUDIT SCOPE	<p>Suntown Technology Group Corporation Limited including the aluminium re-melting, re-finishing and re-cycling and semi-fabrication activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• 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

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- 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

14 November 2019 – 13 November 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

13 November 2020

CERTIFICATION
NUMBER

54

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Suntown Technology Group Corporation Limited 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.
1.2 Management system	Conformance	The Entity has a Management System that addresses all applicable requirements of the CoC Standard, in all facilities under its control related to the Management of the CoC Material. The CoC manual and relevant procedures /records are established, which include the purpose, scope, responsibilities and the general system and workflow of ASI CoC system.
1.3 Management system reviews	Conformance	The Entity 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 and improvement.
1.4 Management representative	Conformance	The Entity has appointed a member of management (Marketing Director) as the responsible person for ASI CoC Standard implementation and defined roles and responsibilities to manage the Chain of Custody system.
1.5 Training	Minor Non-Conformance	The Entity delivers training to relevant personnel to raise awareness of ASI CoC requirements. However, insufficient training is provided to workers.
1.6 Record keeping	Conformance	The Entity 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)	Not Applicable	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.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	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.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	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)	Not Applicable	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)	Not Applicable	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)	Not Applicable	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)	Not Applicable	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.
2 OUTSOURCING CONTRACTORS		
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.
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.

CRITERION	RATING	COMMENT
2.5 Error management	Not Applicable	The criterion is not applicable as the Entity does not have any Outsourcing Contractors.
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.
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	Conformance	Scrap metal is used by the Entity which is included in the Entity's ASI CoC Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	Scrap metal is used by the Entity 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. At the time of the audit, no eligible scrap was being sourced from outside 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	Conformance	The identity, principals and place/s of operation of all direct suppliers of Recyclable Scrap Material is recorded in the Entity Material Accounting System.
4.3b Cash payments	Conformance	The Entity's Chain of Custody Management Manual has the procedure to ensure that cash payments are under US\$10,000.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity's Chain of Custody Management Manual ensures production of ASI Aluminium only from the

CRITERION	RATING	COMMENT
		Casthouse that is within the Entity's CoC Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity's Chain of Custody Management Manual 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 (ERP system) to link and trace the input quantity of CoC material. The ASI Aluminium could be identified in the ERP system by unique number, which could be tracked the input quantity of CoC Material in each month. The Entity would use the label to identify and trace the ASI Aluminium during the whole production process and material transferring process.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's Chain of Custody Management Manual ensures production of ASI Aluminium only from the Post-Casthouse that is within the Entity's CoC Certification Scope. The Post-casthouse is located in Changsha site in the audit 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 the ERP system could trace ASI Aluminium (no matter from COC certified Entity or with CoC documentation) with unique number. Currently, due to all of their suppliers were not certified Entity, the Entity is communicating the ASI certification progress with their suppliers.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has the anti-corruption policy, covering the ASI CoC criteria of anti-corruption. All major next tier suppliers receive communication about the policy, and the Commitment Letters of Responsible Purchasing, which includes anti-corruption policy, are signed by the suppliers.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity 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.

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity 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, which includes the requirements of Human Rights Due Diligence, are signed by the suppliers.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity 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.
7.2 Risk assessment	Conformance	The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts where relevant. The Entity can undertake measurable risk mitigation where risks of adverse impacts are identified. The Entity also conducts second party audits of its major next tier suppliers.
7.3 Complaints mechanism	Conformance	The Entity has established a clear complaints mechanism (TEL: 4000562828, email: snto@chinasnto.com) that allows interested parties to voice concerns about non-compliance with its responsible sourcing policy in its Aluminium supply chain.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Minor Non-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, but there is no explanation of the actions to take when the Output Quantity does not balance with the input quantity.
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-customer 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.

CRITERION	RATING	COMMENT
8.3 Material Accounting Period	Conformance	The Material Accounting Period is defined as 12 months for 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 was no example of effective implementation of the system as no ASI CoC material was available.
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 was no example 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 was no example 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 was no example 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 is defined. At the time of the audit, there was no example 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 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 was no example 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 (ERP System), which will ensure the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting

CRITERION	RATING	COMMENT
		Period. At the time of the audit, there was no example 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's Material Accounting System (ERP System) and internal control mechanisms will ensure that Internal Overdraw does not exceed the amount of CoC Material affected by a force majeure situation. At the time of the audit, there was no example 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's Material Accounting System (ERP System) and internal control mechanisms will ensure that Internal Overdraw will be made up within the subsequent Material Accounting Period. At the time of the audit, there was no example 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's Material Accounting System (ERP System) and internal control mechanisms will assure that a positive balance is carried over to the subsequent material accounting period. At the time of the audit, there was no example 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's Material Accounting System (ERP System) and internal control mechanisms will ensure a positive balance, which is carried over to the subsequent material accounting period, will expire at the end of that period if not drawn down. At the time of the audit, there was no example 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 was no example 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 was no example of effective

CRITERION	RATING	COMMENT
		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 was no example 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 with the issuing Entity. At the time of the audit, there was no example 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 was no example 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 was no example 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 was no example 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 was no example 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 was no example of effective implementation of the system

CRITERION	RATING	COMMENT
		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 the ASI CoC Standard, the mass of total Material is included. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
9.3a Sustainability Data (optional)	Conformance	The Entity uses ASI CoC Document template in ASI CoC Standard, the optional sustainability data is included. The Entity has established system to calculate the GHG emissions of scope 1 and scope 2 for ASI Aluminium. At the time of the audit, there was no example 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. The Entity has established system to calculate the GHG emissions of scope 1 and scope 2 for ASI Aluminium. At the time of the audit, there was no example 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 ASI Performance Standard certification status is included. The Entity will provide data about ASI Performance standard Certification status upon request by customers. At the time of the audit, there was no example 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 (such as GHG claims, the calculation of GHG emission, harmonized external certification) per the requirements from customer. At the time of the audit, there was no example 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 was no example of

CRITERION	RATING	COMMENT
		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.
10 RECEIVING COC DOCUMENTS		
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 was no example of effective implementation of the system as no ASI CoC materials was 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 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 was no example 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. The Entity does not intend to utilize the ASI Market Credits System currently.
11.1b Link to Casthouse Products	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.1c No double counting	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.

CRITERION	RATING	COMMENT
11.2a Date of issue	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2b Reference number	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2c Issuing Entity	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2d Receiving Entity	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2e Conformance statement	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2f ASI Credits statement	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.2g Quantity	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3c Expiry	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3d No re-trading	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3e No allocation to physical products	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable. The Entity does not intend to utilize the ASI Market Credits System currently.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The responsibility of claims and communication is defined, the Entity has established the ASI Claims and communication procedure. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
12.1b Verifiable evidence	Conformance	The responsibility of claims and communication is defined, the Entity has established the ASI Claims

CRITERION	RATING	COMMENT
		and communication procedure. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC material was available in the Entity's supply chain.
12.1c Employee training	Conformance	The Entity provides training courses on Claims and Communication to relevant employees.