

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SHANGHAI SHENHUO ALUMINIUM FOIL CO., LTD

CERTIFICATE
NUMBER

65

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

10 JANUARY 2020

DATE OF EXPIRY

9 JANUARY 2023

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Shenhuo'.

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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

Shanghai Shenhua Aluminium Foil Co., Ltd.
located in Shanghai, China which carries out the
manufacture of aluminium and aluminium alloy
foils.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Shanghai Shenhua Aluminium Foil Co., Ltd
ENTITY NAME	Shanghai Shenhua Aluminium Foil Co., Ltd
CERTIFICATION SCOPE	Shanghai Shenhua Aluminium Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of aluminium and aluminium alloy foils.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post- Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	November 14, 2019 - November 15, 2019
AUDIT SCOPE	Shanghai Shenhua Aluminium Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of aluminium and aluminium alloy foils.
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.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	10 January 2020 to 9 January 2023
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT
DATE

10 July 2021

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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an active ASI member committed to comply with ASI's membership obligations and the ASI complaints mechanism. The Entity is in the production and transformation category. https://aluminium-stewardship.org/about-asi/asi-members/shanghai-shenhuo-aluminium-foil-co-ltd/
1.2 Management system	Conformance	The Entity established policies, systems, procedures and processes that can comply with ASI 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 in the certification period.
1.3 Management system reviews	Conformance	The Entity established a process to periodical review of the ASI CoC Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance/improvement.
1.4 Management representative	Conformance	Senior management has nominated the Technical & Quality Manager as the ASI Management Representative to have overall responsibility of the implementation of ASI CoC and for the conformance with all applicable requirements of the CoC Standard.
1.5 Training	Conformance	The Entity 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. Evidence of training conducted ongoing planned training was sighted during the audit.
1.6 Record keeping	Conformance	The Entity establishes the record management procedure based on ISO 9001 management procedure to maintain records (Management System) covering all applicable requirements of the CoC standard including the retention requirement of ASI records.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Not applicable for 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

CRITERION	RATING	COMMENT
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 for first Certification Audit
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable for first Certification Audit
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	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.
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.

CRITERION	RATING	COMMENT
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 itself producing ASI Aluminium only from the eligible supplier that is certified to the ASI CoC Standard. This was evidenced in the ASI CoC Management Manual.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Shanghai Shenhua Aluminium Foil Co., Ltd, is already certified to the ASI Performance Standard. The Entity's ASI PS Certification information is available on ASI website.

CRITERION	RATING	COMMENT
		https://aluminium-stewardship.org/about-asi/asi-members/shanghai-shenhuo-aluminium-foil-co-ltd/
6.1c Sourcing ASI Aluminium	Conformance	Shanghai Shenhuo Aluminium Foil Co., Ltd has systems in place to ensure that the ASI Aluminium is purchased only from the eligible Entities directly or indirectly via an eligible metals trader and the associated CoC Document will be supplied or verified by the ASI CoC Certified Entity. 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.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The responsible sourcing policy covers the anti-corruption. All identified major next tier suppliers are communicated with the policy, signed Commitment Letters of Business Ethics are signed by the suppliers. The responsible sourcing policy is published on: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has the responsible purchasing policy, covering the ASI CoC criteria of responsible sourcing. All major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The responsible sourcing policy is published on: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
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 identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The responsible sourcing policy is published on: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has responsible sourcing policy covers the ASI CoC criteria of Conflict Affected and High-Risk Areas. The relevant training course are provided to employees. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Non-Conflict-Mineral. The responsible sourcing policy is published on: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
7.2 Risk assessment	Conformance	The Entity has established a supplier responsible sourcing framework including risk-assessment and qualification process. The Entity assesses the risks of non-compliance with its responsible sourcing policy by its suppliers of Non-CoC Material. Undertakes measurable

CRITERION	RATING	COMMENT
		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 a Whistleblower/Complaint channel to enable employees and external stakeholders to report anonymously potential misconducts. The channel is provided to all stakeholders. http://www.shalfoil.com/NewsDetail.aspx?ID=2814
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity 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. This was evidenced in the ASI CoC Management Manual and simulation case.
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 from January 1 to December 31.
8.4 Input Percentage	Conformance	How to calculate and record the percentage of the CoC material is defined in the Material Accounting System in compliance with ASI CoC requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	Output Quantity determination is defined in the Material Account System procedures and processes. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.7 Output Quantity designation	Conformance	The Entity's output quantity is designated as 100% CoC material as per Material Account System procedures and processes. At the time of the audit, there were no

CRITERION	RATING	COMMENT
		examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	Each transfer of the eligible pre-customer scraps from the Entity is accompanied with CoC document, the calculation of the percentage follows the formula defined in ASI CoC standard. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.9 Outputs not exceed inputs	Conformance	The Entity's mass accounting system is developed to have updated information on inventory balance on a frequent basis to guarantee the Outputs not exceed Inputs. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period is defined in the Mass Account System. This was evidenced in the ASI CoC Management Manual and the simulation case.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity established process in the Material Accounting system to control internal overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity established process in the Material Accounting system to control internal overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. The Internal Overdraw shall be made up within the subsequent Material Accounting Period, the amount of internal overdraw and the affected customer shall be ensured the same.
8.11a Positive Balance (carry over)	Conformance	The Entity established process in the Material Accounting system to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements.
8.11b Positive Balance (expiry)	Conformance	The Entity established process in the Material Accounting system to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation case.

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

CRITERION	RATING	COMMENT
9.2g Type of CoC Material	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard, include type of CoC Material. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2h Mass of CoC Material	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard, include mass of CoC material. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.2i Mass of total material	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard, include mass of total material. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.3a Sustainability Data (optional)	Not Applicable	Not applicable. The Entities is not engaged in Aluminium Smelting, or Aluminium Re-Melting/Refining, or operating a Casthouse.
9.3b Sustainability Data (passing on)	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard, include sustainability data. The data is based on the GHG emission calculation report which is published on the Entity's official website. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard, include ASI certification status. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.4 Supplementary Information (optional)	Conformance	The Entity will issue CoC document for each lot of material/product in the template defined in ASI CoC Standard. The Supplementary Information will based on the output of the ASI PS management system. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.5 Response to verification requests	Conformance	The Entity defines the responsibility and the process to respond the requests for verification of information in

CRITERION	RATING	COMMENT
		CoC Documents issued by the Entity. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
9.6 Error management	Conformance	Integrated with ISO 9001 Quality Management System, the Entity has a process to record the errors, analyze the root cause, take the associated correction action to prevent the reoccurrence. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity implements the process to verify the required information in the received CoC documents as required by ASI Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual and the simulation case.
10.2 Verify consistency with shipments	Conformance	The Entity implements the process to verify the required information in the received CoC documents as required by ASI Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual and the simulation case.
10.3 Verify supplier CoC Certification status	Conformance	The Entity implements the developed process to verify the supplier CoC Certification status. This was evidenced in the ASI CoC Management Manual and the simulation case.
10.4 Error management	Conformance	Integrated with ISO 9001 Quality Management System, the Entity has a process to record the errors, analyze the root cause, take the associated correction action to prevent the reoccurrence with suppliers. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
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

CRITERION	RATING	COMMENT
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
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
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity's ASI CoC Management Manual defines all claims and communications shall follow the ASI Claims Guide including communication with ASI secretariat, and the relevant roles and responsibilities are defined. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	<p>Combining with the quality management system against ISO 9001, in the Entity the document and record management procedure in place and is implemented to ensure that claims are made in a manner consistent with the ASI Claims Guide and verifiable.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.</p>
12.1c Employee training	Conformance	<p>The Entity provides the training courses on Claim and Communication to the relevant employees. Evidence of training conducted ongoing planned training was sighted during the audit.</p>