

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# SHANDONG NANSHAN ALUMINUM CO., LTD.

CERTIFICATE  
NUMBER

62

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

7 JANUARY 2020

DATE OF EXPIRY

6 JANUARY 2023

CERTIFIED SINCE

7 JANUARY 2020

AUTHORISED BY

A handwritten signature in white ink, consisting of stylized initials and a long horizontal line extending to the right.

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-<br/>stewardship.org)*

CERTIFICATION SCOPE

Headquarters: Shandong Nanshan Aluminium Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the scope:

Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. Included facilities: (1). Longkou Donghai Alumina Co., Ltd. (2). Shandong Nanshan Aluminium Co., Ltd. (3). Shandong Nanshan Aluminium Co., Ltd. (4). Plate Company of Shandong Nanshan Aluminum Co., Ltd.

Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. Included facilities: (1). Longkou Nanshan Aluminum Rolling New Material Co., Ltd. (2). Longkou Nanshan Aluminum Rolling New Material Co., Ltd.

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

|                         |   |
|-------------------------|---|
| MEMBER NAME             | Shandong Nanshan Aluminium Co., Ltd.  |
| ENTITY NAME             | Shandong Nanshan Aluminium Co., Ltd.  |
| CERTIFICATION SCOPE     | <p>Headquarter: Shandong Nanshan Aluminium Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions.</p> <p>The following sites/facilities are included in the scope:</p> <p>Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"><li>• (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).</li><li>• (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).</li><li>• (3). Shandong Nanshan Aluminum Co., Ltd. (450,000 t/a aluminum alloy slab production line).</li><li>• (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).</li></ul> <p>Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"><li>• (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).</li><li>• (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).</li></ul> |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Casthouses</li><li>• Aluminium Re-melting/Refining</li><li>• Semi-Fabrication</li></ul>   |
| ASI STANDARD            | <ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>  |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Certification Audit</li></ul>   |
| AUDIT FIRM              | DNV GL  |
| AUDIT DATE              | 4 – 8 November 2019   |
| AUDIT REPORT SUBMISSION | 21 November 2019  |

|                               |  |
|-------------------------------|--|
| AUDIT SCOPE                   | <p>Headquarters: Shandong Nanshan Aluminium Co., Ltd. (Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China), H.Q. functions. The following sites/facilities are included in the audit scope:</p> <p>Site 1: Donghai Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"> <li>• (1). Longkou Donghai Alumina Co., Ltd. (600,000 t/a alumina production line of Phase I).</li> <li>• (2). Shandong Nanshan Aluminium Co., Ltd. (480,000 t/a electrolysis aluminum production line of Phase IV).</li> <li>• (3). Shandong Nanshan Aluminium Co., Ltd. (450,000 t/a aluminum alloy slab production line).</li> <li>• (4). Plate Company of Shandong Nanshan Aluminium Co., Ltd. (200,000 t/a aluminum alloy plate and strip production line).</li> </ul> <p>Site 2: Nanshan Industrial Park, Longkou City, Yantai City, Shandong Province, China. included facilities:</p> <ul style="list-style-type: none"> <li>• (1). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (750,000 t/a hot rolling production line).</li> <li>• (2). Longkou Nanshan Aluminium Rolling New Material Co., Ltd. (600,000 t/a aluminum alloy plate and strip production line).</li> </ul> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> <li>• Alumina Refining</li> <li>• Aluminium Smelting</li> <li>• Casthouses</li> <li>• Aluminium Re-melting/Refining</li> <li>• Semi-Fabrication</li> </ul> <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> |
| 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><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.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li><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.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>  |
| CERTIFICATION PERIOD          | 7 January 2020 – 6 January 2023  |
| NEXT AUDIT TYPE               | Surveillance   |
| NEXT AUDIT DUE DATE           | 7 July 2021  |
| CERTIFICATION NUMBER          | 62   |

## 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.<br><a href="https://aluminium-stewardship.org/about-asi/asi-members/shandong-nanshan-aluminium-co-ltd/">https://aluminium-stewardship.org/about-asi/asi-members/shandong-nanshan-aluminium-co-ltd/</a>                  |
| 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 review at least once every 12 months the Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance/improvement. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO9001 quality management system.   |
| 1.4 Management representative              | Conformance    | Senior management has nominated General manager of Shandong Nanshan Aluminium Co., Ltd. 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 have established and implemented communications and training measures that make relevant personnel aware of and 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 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.   |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| 1.7c Reporting to ASI (Positive Balance)   | Not Applicable | Not applicable for first Certification Audit.   |
| 1.7d Reporting to ASI (Internal Overdraw)  | Not Applicable | Not applicable for first Certification Audit.   |
| 1.7e Reporting to ASI (Eligible Scrap)   | Not Applicable | Not applicable 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.   |
| <b>2 OUTSOURCING CONTRACTORS</b>   |                |   |
| 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 site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| 2.2b No further outsourcing  | Not Applicable | The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| 2.2c Risk assessment   | Not Applicable | The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| 2.3 Output Quantity  | Not Applicable | The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| 2.4 Verification and record-keeping  | Not Applicable | The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| 2.5 Error management   | Not Applicable | The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.   |
| <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.   |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 3.2a CoC Certification Scope – Alumina Refining                               | Conformance    | The observed system ensures production of ASI Alumina only from the alumina facilities that are within the Entity's CoC Certification Scope.  |
| 3.2b ASI Performance Standard – Alumina Refining                              | Conformance    | The observed system ensures production of ASI Alumina only from the alumina facilities that are certified against the ASI Performance Standard.   |
| 3.3a CoC Certification Scope – Aluminium Smelting                             | Conformance    | The observed system ensures production of ASI Liquid Metal only from the aluminum smelter that is within the Entity's CoC Certification Scope.  |
| 3.3b ASI Performance Standard – Aluminium Smelting                            | Conformance    | The observed system ensures production of ASI Liquid Metal only from the aluminum smelters that are certified against the ASI Performance Standard.   |
| <b>4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL</b> |                |   |
| 4.1a CoC Certification Scope – Aluminium Re-Melting/Refining                  | Conformance    | The Entity has processes and systems in place to ensure that ASI Liquid Metal is produced only from the ASI CoC Certified Facilities that are within the Entity's own CoC Certification Scope. The CoC Material Accounting System of the Entity is ready and has been tested.   |
| 4.1b ASI Performance Standard – Aluminium Re-Melting/Refining                 | Conformance    | The observed system ensures production of ASI Liquid Metal only from the aluminum Facilities that are certified against the ASI Performance Standard.   |
| 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 facilities, which is included in the Entity's CoC Certification Scope. This was evidenced in CoC Material Management Procedures and CoC Material Accounting System. |
| 4.2b Post-Consumer Scrap  | Not Applicable | The criterion is not applicable as the Entity does not source recyclable Scrap Material from suppliers.   |
| 4.3a Supplier records   | Not Applicable | The criterion is not applicable as the Entity does not source recyclable Scrap Material from suppliers.   |
| 4.3b Cash payments  | Not Applicable | Not applicable as no cash payments.   |
| <b>5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>                               |                |   |
| 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.  |

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| 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 systems in place to ensure that unique identification numbers, either physically stamped and/or printed on ASI Aluminium products or their packaging, can be linked to their Material Accounting System. The Material Accounting System on the Casthouse site of the Entity is ready and has been tested.  |
| 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 facilities 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 produce ASI Aluminium only from the Entity certified facilities against the ASI Performance Standard.  |
| 6.1c Sourcing ASI Aluminium                                      | Conformance | The Entity has systems in place to ensure that the ASI Aluminium is purchased only from the eligible Entities/facilities directly or indirectly via a metals trader and warehouse. The Entity is currently not sourcing ASI Aluminium from other CoC certified entities for its post-casthouse. 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.                         |
| 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:<br><a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>                |
| 7.1b Responsible sourcing policy (responsible sourcing)          | Conformance | The Entity has a responsible purchasing policy, covering the ASI CoC criteria of anti-corruption. All major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The responsible purchasing policy is published on:<br><a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a> |
| 7.1c Responsible sourcing policy (human rights due diligence)    | Conformance | The Entity has a responsible purchasing policy, covering the ASI CoC criteria of Human Rights Due   |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
|  |                | Diligence. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The responsible purchasing policy is published on: <a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>   |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance    | The Entity has a responsible sourcing policy covers the 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 purchasing policy is published on: <a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a>   |
| 7.2 Risk assessment  | Conformance    | The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts where relevant. The Entity also conducts second party audits of its major next tier suppliers.   |
| 7.3 Complaints mechanism   | Conformance    | The Entity has a complaints mechanism that meets the requirements of the ASI Performance Standard Criterion 3.2. 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. The whistleblower/complaint channel general contact phone numbers are +86 535 8807679-Aluminum rolling company, +86 535 5130777-Plate company, +86 535 8590566-Aluminum company, +86 535 8608588-Alumina company. Refer page 5 of the Entity's Policy for Labor and Business Ethics. The information can be reached via: <a href="http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf">http://www.600219.com.cn/static/admin/upload/file/20190919/20190919091655_79073.pdf</a> |
| 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 the simulation cases.  |
| 8.2a Post-Consumer Scrap   | Not Applicable | The Entity has not used any post-consumer scraps.  |



| CRITERION  | RATING      | COMMENT  |
|--|-------------|--|
| 8.2b Pre-Consumer Scrap (total)                          | Conformance | The Mass Balance System is established to record the total Quantity of Pre-Consumer Scrap and the status of CoC/Non CoC.   |
| 8.2c Pre-Consumer Scrap (Eligible Scrap)                 | Conformance | For the Eligible Scrap from external suppliers and internal brother company, the CoC documents are required to be provided. The quantity of eligible scrap is recorded in the Mass Balance System.   |
| 8.3 Material Accounting Period                           | Conformance | The Material Accounting Period is defined as 12 months, in accordance with the Entity's financial year.  |
| 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) | Conformance | How to calculate the Percentage of aluminium in the scrap is defined in the Mass Accounting System procedure in accordance to the ASI CoC standard.  |
| 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 can be designated as 100% CoC material as per 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.                         |
| 8.8 Output Quantity – Pre-Consumer Scrap                 | Conformance | Each transfer of the eligible pre-customer scraps from the Entity shall be accompanied with CoC document, the calculation of the percentage shall follow the formula defined in ASI CoC standard. This was evidenced in the ASI CoC Management Manual and the simulation cases.                        |
| 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. This was evidenced in the ASI CoC Management Manual and the simulation cases.  |
| 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   |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
|   |             | System. This was evidenced in the ASI CoC Management Manual and the simulation cases.  |
| 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. This was evidenced in the ASI CoC Management Manual and the simulation cases.   |
| 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. This was evidenced in the ASI CoC Management Manual and the simulation cases.   |
| 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 cases.   |
| 9 ISSUING COC DOCUMENTS                               |             |  |
| 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: date + serial number + version number. At the time of the audit,  |

| CRITERION                           | RATING      | COMMENT  |
|-------------------------------------|-------------|--|
|                                     |             | 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 a 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 a 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 a 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 a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include conformance statement.  |
| 9.2g Type of CoC Material           | Conformance | The Entity will issue a 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 a 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 a 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) | Conformance | The Entity will issue a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include sustainability data. The data is  |

| CRITERION                                    | RATING      | COMMENT   |
|--|-------------|---|
|  |             | 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.   |
| 9.3b Sustainability Data (passing on)        | Conformance | The Entity will issue a 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 a CoC document for each lot of material/product in the template defined in ASI CoC Standard, include ASI certification status.  |
| 9.4 Supplementary Information (optional)     | Conformance | The Entity has established, implemented, maintain a management system against ASI Performance Standard including GHG emission calculation and the information in CoC documents are 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 CoC Documents issued by the Entity. This was evidenced in the ASI CoC Management Manual.   |
| 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. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 quality management system.   |
| <b>10 RECEIVING COC DOCUMENTS</b>            |             |   |
| 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.   |
| 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   |

| CRITERION                                     | RATING      | COMMENT  |
|---|-------------|--|
|   |             | was evidenced in the ASI CoC Management Manual.  |
| 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.  |
| 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. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 quality management system. |

#### 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. |
| 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. |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 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 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. |
| 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 there was no sourcing and transfer of CoC Material.   |
| 12.1c Employee training                             | Conformance    | The Entity provides the training courses on Claims and Communication to the relevant employees.   |