
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

KUNSHAN ALUMINIUM CO.,LTD.

CERTIFICATE
NUMBER

95

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

8 SEPTEMBER 2020

DATE OF EXPIRY

7 SEPTEMBER 2023

CERTIFIED SINCE

8 SEPTEMBER 2020

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', with 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*

CERTIFICATION SCOPE

The business scope of Kunshan Aluminium CO., LTD. includes the development, production and sales of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials. The company's double zero aluminium foil design capacity of 25,000 tons / year, product width of 1920mm, products include food, cigarettes, medicine, daily necessities, cosmetics and other high-end packaging foil and high-grade foil for the electronics industry.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Kunshan Aluminium CO., LTD.
ENTITY NAME	Kunshan Aluminium CO., LTD.
CERTIFICATION SCOPE	The business scope of Kunshan Aluminium CO., LTD. includes the development, production and sales of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials. The company's double zero aluminium foil design capacity of 25,000 tons / year, product width of 1920mm, products include food, cigarettes, medicine, daily necessities, cosmetics and other high-end packaging foil and high-grade foil for the electronics industry.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	27 . 29 July 2020
AUDIT REPORT SUBMISSION	27 August 2020
AUDIT SCOPE	The audit scope included the following: Kunshan Aluminium facility at No 269, Nijiabang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province. All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	8 September 2020 . 7 September 2023
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NEXT AUDIT TYPE	Surveillance audit
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NEXT AUDIT DUE DATE	4 March 2022
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CERTIFICATE NUMBER	95
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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/kunshan-aluminium-co-ltd/ .
1.2 Management system	Conformance	The Entity established Policies, systems, procedures and processes that can comply with the 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 BSI 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 ISO 9001 Quality Management System.
1.4 Management representative	Conformance	A senior management member has nominated the Vice General 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 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 19001 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.

CRITERION	RATING	COMMENT
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.
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 as the Entity does not intend to utilize the ASI Market Credits System.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not Applicable as the Entity does not intend to utilize the ASI Market Credits System.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	The Entity does not use Outsourcing Contractors for the purpose 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.

CRITERION	RATING	COMMENT
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	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 observed system ensures production of ASI Aluminium only from the Facilities that are within the Entity's CoC Certification Scope.
6.1b ASI Performance Standard . Post-Casthouse	Conformance	The Entity has systems in place to ensure that it produces ASI Aluminium only from the Entity's

CRITERION	RATING	COMMENT
		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. 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 Anti-Corruption. All identified major next tier suppliers are informed about the Policy, and the Commitment Letters of Business Ethics are signed by the suppliers. The Responsible Sourcing Policy is published on: http://www.akscn.net/UpLoad/files/ASI-04.pdf .
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has the Responsible Purchasing Policy, covering the ASI CoC Criteria for responsible purchasing sourcing. All major next tier suppliers are informed about the Policy and they signed the Commitment Letters of Responsible Purchasing. The Responsible Purchasing Policy is published on: http://www.akscn.net/UpLoad/files/ASI-04.pdf .
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has the Responsible Purchasing Policy, covering the ASI CoC Criteria for Human Rights Due Diligence. All identified major next tier suppliers are informed about the Policy and they signed the Commitment Letters of Responsible Purchasing. The Responsible Purchasing Policy is published on: http://www.akscn.net/UpLoad/files/ASI-04.pdf .
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity's Responsible Sourcing Policy covers the Conflict-Affected and High-Risk Areas. The relevant training course is provided to employees. All identified major next tier suppliers are informed about the Policy and they signed the Commitment Letters of Non-Conflict-Mineral. The Responsible Purchasing Policy is published on: http://www.akscn.net/UpLoad/files/ASI-04.pdf .
7.2 Risk assessment	Conformance	The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts

CRITERION	RATING	COMMENT
		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 anonymously report potential misconducts. The channel: hotline: +86-0512-57647862, mailbox: aksjw@akscn.net is provided to all stakeholders. The information can be accessed via: http://www.akscn.net/UpLoad/files/ASI-04.pdf .
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	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, 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)	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 Accounting 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.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	Conformance	The Entity's Output Quantity can be designated as 100% CoC Material as per Material Accounting 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-Consumer Scraps from the Entity shall be accompanied with a CoC document, the calculation of the percentage shall follow the formula defined in the 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 do 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 and is defined in the Mass Accounting 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 a process in the Material Accounting System to Control the 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 a process in the Material Accounting System to Control the 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 a process in the Material Accounting System to Control the 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.

CRITERION	RATING	COMMENT
8.11b Positive Balance (expiry)	Conformance	The Entity established a 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 Documents for each Material/product defined in the ASI CoC Standard, and include their 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 Documents for each Material/product defined in the template in the ASI CoC Standard, and include a reference number: CoC + invoice 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 ASI CoC Material.
9.2c Issuing Entity	Conformance	The Entity will issue a CoC Document for each Material/product defined in the template in the ASI CoC Standard, and include the 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 Material/product defined in the template in the ASI CoC Standard, and include the 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 Material/product defined in the template in the ASI CoC Standard, and include the responsible employee. 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.
9.2f Conformance statement	Conformance	The Entity will issue a CoC Document for each Material/product defined in the template in the ASI CoC Standard, and include a conformance statement.
9.2g Type of CoC Material	Conformance	The Entity will issue a CoC Document for each Material/product defined in the template in the ASI CoC Standard, and include the 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 Material/product defined in the template in the ASI CoC Standard, and include the 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 Material/product defined in the template in the ASI CoC Standard, and 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, as the Entity's activity is Post-Casthouse.
9.3b Sustainability Data (passing on)	Conformance	The Entity will issue a CoC Document for each Material/product defined in the template in the ASI CoC Standard, and 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 Material/product defined in the template in the ASI CoC Standard, and include the ASI Certification Status.
9.4 Supplementary Information (optional)	Conformance	The Entity has established, implemented, maintained a Management System against the

CRITERION	RATING	COMMENT
		ASI Performance Standard, including GHG emission calculation and the information in the CoC Documents is 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 to 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, and take the associated corrective action to prevent a 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.
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 the 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 the ASI Chain of Custody Standard. This 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's 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, and take the associated corrective action to prevent a 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		

CRITERION	RATING	COMMENT
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.
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.

CRITERION	RATING	COMMENT
12.1a ASI Claims Guide	Conformance	The Entity's ASI CoC Management Manual defines that all claims and communications shall follow the ASI Claims Guide, including communications with ASI Secretariat, and the relevant roles and responsibilities 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.

Document Control and Version History

Revision	Date	Notes
0	8 September 2020	Issued (Full Certification)