

ASI CERTIFICATION
CHAIN OF CUSTODY
STANDARD



PRESENTED TO

**SHANGQIU
YANGGUANG
ALUMINIUM
PRODUCT CO., LTD.**

CERTIFICATE
NUMBER

144

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

6 AUGUST 2021

DATE OF EXPIRY

5 AUGUST 2024

CERTIFIED SINCE

6 AUGUST 2021

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

Production and Sales Service of Aluminium and
Aluminium Alloy Plate, Sheet, Strip and Related
Management Activities.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Shangqiu Yangguang Aluminium Product Co., Ltd.
ENTITY NAME	Shangqiu Yangguang Aluminium Product Co., Ltd.
CERTIFICATION SCOPE	Production and Sales Service of Aluminium and Aluminium Alloy Plate, Sheet, Strip and Related Management Activities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	15 – 16 June 2021
AUDIT REPORT SUBMISSION	2 July 2021
AUDIT SCOPE	<p>The audit scope covers Shangqiu Yangguang Aluminium Product Co., Ltd, Henan Province (China). The main products include Aluminium and Aluminium Alloy Plate, Sheet and Strip. Main production processes include casting, cold rolling, annealing and packing.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p>At the time of the Audit (June 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</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

6 August 2021 – 5 August 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

5 August 2023

CERTIFICATION
NUMBER

144

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/shangqiu-yangguang-aluminium-product-co-ltd/
1.2 Management system	Conformance	The Entity established policies, systems, procedures and processes that 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 to January 2024.
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 system 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	The Director of Production & Manufacturing and Vice Chief Engineer, a senior management member has been nominated as the ASI Management Representative to have overall responsibility of the implementation of ASI Chain of Custody Standard and for the conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Record keeping	Conformance	The Entity establishes the record management procedure based on ISO 9001 Management System procedure to maintain records (Management System) covering all applicable requirements of the ASI Chain of Custody Standard including the retention requirement of ASI records.

CRITERION	RATING	COMMENT
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.
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 purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	The Entity does not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.

3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

CRITERION	RATING	COMMENT
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	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	Conformance	The observed system ensures production of ASI Aluminium only from the Casthouse that is within the Entity's CoC Certification Scope.
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 a unique identification bar code number label, either physically stamped 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. At the time of

CRITERION	RATING	COMMENT
		the audit, there were no examples of effective implementation of the system as no ASI CoC Material is available in the Entity's supply chain.
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 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 Aluminum only from an Entity or Facility certified 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 Entity's responsible sourcing policy covers anti-corruption. All identified major next tier suppliers are communicated with on the policy and have signed a Commitment Letter of Business Ethics. The responsible sourcing policy is published on: https://mp.weixin.qq.com/s/mjz38EpzIYBq5Ajgf7U7Dw
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has a responsible purchasing policy, covering responsible sourcing. All major next tier suppliers are communicated with on the policy and have signed the Commitment Letter of Responsible Purchasing. The responsible purchasing policy is published on: https://mp.weixin.qq.com/s/mjz38EpzIYBq5Ajgf7U7Dw
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has a responsible purchasing policy, covering Human Rights Due Diligence. All identified major next tier suppliers are communicated with on the policy and have signed the Commitment Letter of Responsible Purchasing. The responsible purchasing policy is published on: https://mp.weixin.qq.com/s/mjz38EpzIYBq5Ajgf7U7Dw
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has responsible sourcing policy, covering conflict affected and high-risk areas. The relevant training courses are provided to

CRITERION	RATING	COMMENT
		<p>employees. All identified major next tier suppliers are communicated with on the policy and have signed the Commitment Letters of Non-Conflict-Mineral.</p> <p>The responsible purchasing policy is published on: https://mp.weixin.qq.com/s/mjz38EpzlyBq5Ajgf7U7Dw</p>
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	<p>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 channels:</p> <p>hotline: +86-370-3155162</p> <p>mailbox: yglcjw@163.com is provided to all stakeholders.</p> <p>The information can be reached via: https://mp.weixin.qq.com/s/mjz38EpzlyBq5Ajgf7U7Dw</p>
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 and Output Quantity of CoC Material and Non-CoC Material by mass which will conform to the ASI CoC requirement. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.
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 the ASI CoC Management Manual (Chapter 8.1), the Entity's financial year is the calendar year. This will be aligned with all other reporting processes.
8.4 Input Percentage	Conformance	As per the ASI Chain of Custody Management Manual, how to calculate and record the

CRITERION	RATING	COMMENT
		<p>percentage of the CoC Material is defined in the Material Accounting System in compliance with ASI CoC requirements.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
8.6 Output Quantity determination	Conformance	<p>As per the ASI Chain of Custody Management Manual, Output Quantity determination is defined in the Material Account System procedures and processes.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>
8.7 Output Quantity designation	Conformance	<p>The Entity's Output Quantity can be designated as 100% CoC Material as per Material Accounting System procedures.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	<p>As per the ASI Chain of Custody Management Manual, each transfer of the eligible Pre-Consumer Scrap from the Entity shall be accompanied with a CoC Document and the calculation of the percentage shall follow the formula defined in ASI Chain of Custody Standard.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>
8.9 Outputs not exceed Inputs	Conformance	<p>As per the ASI Chain of Custody Management Manual, the output of CoC Material must be calculated using the Input Percentage and must not proportionally exceed inputs of CoC Material. The Production Department is responsible for ensuring the requirement is met.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>
8.10a Internal Overdraws (not exceed 20%)	Conformance	<p>As per the ASI Chain of Custody Management Manual, the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.</p>

CRITERION	RATING	COMMENT
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established a process in the Material Accounting System to control Internal Overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a process in the Material Accounting System to control Internal Overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.
8.11a Positive Balance (carry over)	Conformance	The Entity has established a process in the Material Accounting System to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.
8.11b Positive Balance (expiry)	Conformance	The Entity has established a process in the Material Accounting System to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material in the Entity's supply chain.
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 no ASI CoC Material is available on the market.
9.2a Date of issue	Conformance	As per the ASI Chain of Custody Management Manual (Chapter 9.2), the Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include date of issue.
9.2b Reference number	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and

CRITERION	RATING	COMMENT
		include a reference number: YG + CoC + year + month + day + serial number.
9.2c Issuing Entity	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the issuing entity.
9.2d Receiving customer	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the receiving customer.
9.2e Responsible employee	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the responsible employee who can verify information in the CoC Document. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Material is available on the market.
9.2f Conformance statement	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include a conformance statement.
9.2g Type of CoC Material	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the type of CoC Material.
9.2h Mass of CoC Material	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the mass of CoC Material.
9.2i Mass of total material	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the mass of total material.
9.3a Sustainability Data (optional)	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include Sustainability Data. The data is based on the GHG emission calculation report which is published on the Entity's official website.
9.3b Sustainability Data (passing on)	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include Sustainability Data. The data is based on

CRITERION	RATING	COMMENT
		the GHG emission calculation report which is published on the Entity's official website.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard, and include the ASI Certification status.
9.4 Supplementary Information (optional)	Conformance	The Entity will issue a CoC Document for each lot of material/product using the template document defined in the ASI Chain of Custody Standard. The Supplementary Information will be based on the output of the Entity's ASI Performance Standard Management System.
9.5 Response to verification requests	Conformance	The Entity defines the responsibility and the process to respond to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error management	Conformance	The Entity has a process, integrated with the ISO 9001 Quality Management System, to record the errors, analyze the root cause and take associated correction action to prevent reoccurrence.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity will implement the process to verify the required information in the received CoC Documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as there was no ASI CoC Material available in the Entity's supply chain.
10.2 Verify consistency with shipments	Conformance	The Entity will implement the process to verify the required information in the received CoC Documents as required by the ASI Chain of Custody Standard.
10.3 Verify supplier CoC Certification status	Conformance	The Entity will implement the developed process to verify the supplier's CoC Certification status.
10.4 Error management	Conformance	The Entity has a process, integrated with the ISO 9001 Quality Management System, to record the errors, analyze the root cause, take associated correction action to prevent the reoccurrence with suppliers.
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.

CRITERION	RATING	COMMENT
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 communication with the 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 ASI CoC Material available in the Entity's supply chain.
12.1b Verifiable evidence	Conformance	The Entity's ASI CoC Management Manual defines that all claims and communications shall follow the ASI Claims Guide including communication with the ASI Secretariat, and the relevant roles and responsibilities are defined.
12.1c Employee training	Conformance	The Entity provides training courses on claims and communication to the relevant employees.

Document Control and Version History

Revision	Date	Notes
0	6 August 2021	Initial Certification Audit – Full Certification