

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SHANGHAI SUNHO ALUMINUM FOIL CO., LTD.

CERTIFICATE
NUMBER

65

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

10 JANUARY 2020

DATE OF EXPIRY

9 JANUARY 2023

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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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 Sunho Aluminum 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 Sunho Aluminum Foil Co., Ltd
ENTITY NAME	Shanghai Sunho Aluminum Foil Co., Ltd
CERTIFICATION SCOPE	Shanghai Sunho Aluminum 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">• Initial Certification Audit (14 – 15 November 2019)• Surveillance Audit (9 – 10 September 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 2 December 2019 (Initial Certification Audit)• 17 October 2021 (Surveillance Audit)
AUDIT DATE	<ul style="list-style-type: none">• 14 – 15 November 2019 (Initial Certification Audit)• 9 – 10 September 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 15 November 2019)</u> Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of aluminium and aluminium alloy foils.</p> <p>The supply chain activities include in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (9 – 10 September 2021)</u> Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of aluminium and aluminium alloy foils.</p> <p>The supply chain activities include in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

AUDIT OUTCOME	<ul style="list-style-type: none"> • Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> ☑ 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	10 January 2020 - 9 January 2023
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	9 January 2023
CERTIFICATION NUMBER	65

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 Chain of Custody 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 periodically review the ASI CoC Management System to assess the effectiveness of the ASI Chain of Custody management and address potential areas of non-conformance/improvement.
1.4 Management representative	Conformance	Senior management has nominated one senior Manager as the ASI Management Representative to have overall responsibility of the implementation of the 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 delivers the training courses to relevant personnel to raise awareness of ASI Chain of Custody Standard requirements and make them competent in their responsibilities under the Standard. Evidence of training conducted and planned ongoing training was verified.
1.6 Record keeping	Conformance	The Entity establishes the record management procedure based on the ISO 9001 management procedure to maintain records (Management System) covering all applicable requirements of the ASI Chain of Custody Standard including the retention requirement of ASI records.
1.7a Reporting to ASI (Inputs and Outputs)	Minor Non-Conformance	The Entity submits the Input and Output Quantities of CoC Materials in the calendar year of 2020. However, a minor non-conformance is raised as the incorrect total Input Quantity of CoC Material was reported to ASI.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Minor Non-Conformance	The Entity reports to ASI the Input Percentage calculated for the calendar year of 2020. However, a minor non-conformance is raised as due to the incorrect reporting of the Input Quantity of CoC Material, the Input Percentage was reported to ASI incorrectly.
1.7c Reporting to ASI (Positive Balance)	Minor Non-Conformance	The Entity reports to ASI the maximum Positive Balance in the calendar year of 2020 carried over to the subsequent Material Accounting Period of 2021. However, a minor conformance is raised as due to the incorrect reporting of the Input Quantity of CoC Material, the maximum Positive Balance in the calendar year of 2020 reported to ASI incorrectly.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity reports to ASI the maximum Internal Overdraw and the percentage of Input Quantity of CoC Material this represents within the calendar year of 2020: There is no Internal Overdraw.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity is not engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity is not engaged in producing Casthouse Products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity reports to ASI the quantity of ASI Credits purchased in the calendar year of 2020. The Entity does not purchase any ASI Credits.
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.

CRITERION	RATING	COMMENT
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		
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		

CRITERION	RATING	COMMENT
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 Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Shanghai Sunho Aluminum Foil Co., Ltd, is already certified to the ASI Performance Standard. The Entity's ASI PS Certification information is available on the ASI website. https://aluminium-stewardship.org/about-asi/asi-members/shanghai-Sunho-aluminium-foil-co-ltd/
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 directly or indirectly via an eligible metals trader and the associated CoC Documents are provided or verified by the ASI CoC Certified Entity. The Material Accounting System is in Excel format for managing and accounting ASI CoC Material. The system was checked and proved to be effective.

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 on the policy, and Commitment Letters of Business Ethics are signed by the suppliers. The responsible sourcing policy is published on the Entity's official website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has a responsible purchasing policy, covering the ASI Chain of Custody criteria of responsible sourcing. All major next tier suppliers are communicated with on the policy and have signed the Commitment Letters of Responsible Purchasing. The responsible sourcing policy is published on the Entity's official website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2816

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has a responsible purchasing policy, covering the ASI Chain of Custody criteria of Human Rights Due Diligence. All identified major next tier suppliers are communicated with on the policy and have signed the Commitment Letters of Responsible Purchasing. The responsible sourcing policy is published on the Entity's official website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has a responsible sourcing policy, covering the ASI Chain of Custody 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 on the policy and have signed the Commitment Letters of Non-Conflict-Mineral. The responsible sourcing policy is published on the Entity's official website at: 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 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 and published on the Entity's official website at: http://www.shalfoil.com/NewsDetail.aspx?ID=2816
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that can record Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass which conforms to ASI Chain of Custody requirement.
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.

CRITERION	RATING	COMMENT
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 Input Percentage of the CoC Material is defined in the Material Accounting System in compliance with ASI Chain of Custody requirements. The records in the Mass Balance System demonstrate the calculation and records of the Input Percentage 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	In the ASI Chain of Custody Management Manual, Output Quantity determination is defined. The records in the Mass Balance System demonstrate the Input Percentage in 2020 is used to determine the Output Quantity 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.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	Each transfer of the eligible Pre-Consumer Scrap from the Entity is accompanied with CoC Document, the calculation of the percentage follows the formula defined in ASI Chain of Custody Standard. No scraps are assigned as CoC Material in 2020.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System is developed to have updated information on inventory balance on a frequent basis to guarantee that the outputs do not exceed inputs. The data in the Mass Balance System shows the output does not proportionally exceed inputs of CoC Material in 2020.
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 as defined in the Mass Account System. There is no overdraw in the Entity in 2020.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity established processes in the Material Accounting system to control Internal Overdraw under a force majeure situation in compliance with ASI Chain of Custody Standard requirements. There is no overdraw in the Entity in 2020.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity established processes in the Material Accounting system to control Internal Overdraw under a force majeure situation in compliance with ASI Chain of

CRITERION	RATING	COMMENT
		<p>Custody Standard requirements. The Internal Overdraw shall be made up within the subsequent Material Accounting Period.</p> <p>There is no overdraw in the Entity in 2020.</p>
8.11a Positive Balance (carry over)	Conformance	<p>The Entity established processes in the Material Accounting System to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements.</p> <p>There is a Positive Balance in the Entity in 2020. The Positive Balance is calculated and recorded.</p>
8.11b Positive Balance (expiry)	Conformance	<p>The Entity established processes in the Material Accounting System to control Positive Balance (carry over) in compliance with ASI Chain of Custody Standard requirements. A Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period shall expire at the end of that Period if not drawn down. This was evidenced in the ASI CoC Management Manual and the simulation case.</p>
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	<p>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. It is verified that each batch of CoC Material is delivered with a CoC Document.</p>
9.2a Date of issue	Conformance	<p>The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the date of issue.</p> <p>All issued CoC Documents include the date of issue.</p>
9.2b Reference number	Conformance	<p>The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes a reference number: CoC + SH + year + serial number.</p> <p>All issued CoC Documents have the reference number following the defined rule.</p>
9.2c Issuing Entity	Conformance	<p>The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the issuing Entity.</p> <p>All issued CoC Documents include the identity, address and CoC Certification number of the Entity.</p>

CRITERION	RATING	COMMENT
9.2d Receiving customer	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the receiving customer. All issued CoC Documents include the identities and addresses of the customers receiving the CoC Material, and their CoC Certification number.
9.2e Responsible employee	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the responsible employee. All issued CoC Documents are reviewed and approved by the responsible persons before sending to customers.
9.2f Conformance statement	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes a conformance statement. All issued CoC Documents include the statement confirming that "The information provided in the CoC Document is in conformance with the ASI Chain of Custody Standard."
9.2g Type of CoC Material	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the type of CoC Material. All issued CoC Documents include the type of CoC Materials in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the mass of CoC Material. All issued CoC Documents include the mass of CoC Materials in the shipment.
9.2i Mass of total material	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes the mass of total Material. All issued CoC Documents include the mass of total Materials in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3b Sustainability Data (passing on)	Conformance	The Entity issues a CoC Document for each lot of material/product using the template defined in the ASI Chain of Custody Standard, and includes Sustainability Data. The data is based on the GHG emission

CRITERION	RATING	COMMENT
		<p>calculation report which is published on the Entity's official website.</p> <p>The average intensity of GHG emissions is not included in all issued CoC Documents because customers have not yet requested.</p>
9.3c Post-Casthouse ASI Certification status	Conformance	<p>The Entity issues a CoC Document for each lot of material/product using the template defined in ASI Chain of Custody Standard, and includes the ASI Certification status.</p> <p>All issued CoC Documents include the ASI Certification status for the ASI Performance Standard for the Entity.</p>
9.4 Supplementary Information (optional)	Conformance	<p>The Entity issues a CoC Document for each lot of material/product using the template defined in ASI Chain of Custody Standard. The Supplementary Information will be based on the output of the ASI PS Management System.</p> <p>No Supplementary Information is provided in the issued CoC Documents because customers have not requested.</p>
9.5 Response to verification requests	Conformance	<p>The Entity defines the responsibility and the process to respond to requests for verification of information in CoC Documents issued by the Entity.</p> <p>No verification request was received as at the audit date.</p>
9.6 Error management	Conformance	<p>Integrated with the 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 reoccurrence.</p> <p>No error in the CoC Documents was found.</p>
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	<p>The Entity implements a process to verify the required information in the received CoC Documents as required by the ASI Chain of Custody Standard. The required information in the received CoC Document is included.</p>
10.2 Verify consistency with shipments	Conformance	<p>The Entity implements a process to verify the required information in the received CoC Documents as required by the ASI Chain of Custody Standard. Its implementation is verified in the surveillance audit.</p>
10.3 Verify supplier CoC Certification status	Conformance	<p>The Entity implements the developed process to verify the supplier's ASI CoC Certification status. The certification status of the supplier issuing the CoC Documents is verified by the Entity and is confirmed in the surveillance audit.</p>
10.4 Error management	Conformance	<p>Integrated with the ISO 9001 Quality Management System, the Entity has a process to record the errors,</p>

CRITERION	RATING	COMMENT
		analyze the root cause, and take the associated corrective action to prevent reoccurrence with suppliers. No error in CoC Documents during 2020 was found.
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.
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.

CRITERION	RATING	COMMENT
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 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. During the surveillance audit, no claims are found to violate the requirements defined in the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has a document and record management procedure in place and implemented to ensure that claims are made in a manner consistent with the ASI Claims Guide and are verifiable. There is no claim made by the Entity, except the CoC Documents, during the period from the certification audit to the surveillance audit date.
12.1c Employee training	Conformance	The Entity provides the training courses on claims and communication to the relevant employees. Evidence of training conducted and planned ongoing training was reviewed.

Revision	Date	Notes
0	10 January 2020	Issued
1	2 June 2021	Updated to reflect a change in the name of the Member to Shanghai Sunho Aluminum Foil Co.,Ltd.
2	22 November 2021	Surveillance Audit; Audit Scope description expanded to include supply chain activities and the criteria included; Criterion 2.5 was not included in Revision 0 or 1 in error and has been updated in Revision 2 with no change to the public headline statement between revisions.