

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SHANGHAI SUNHO ALUMINUM FOIL CO., LTD.

CERTIFICATE
NUMBER

65

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION
LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

10 JANUARY 2023

DATE OF EXPIRY

9 JANUARY 2026

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

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

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

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	<ul style="list-style-type: none">• Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (14 – 15 November 2019)• Surveillance Audit (9 – 10 September 2021)• Re-Certification Audit and Scope Change (1 – 2 December 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 14 – 15 November 2019 (Initial Certification Audit)• 9 – 10 September 2021 (Surveillance Audit)• 1 – 2 December 2022 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 2 December 2019 (Initial Certification Audit)• 17 October 2021 (Surveillance Audit)• 30 December 2022 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 15 November 2019)</u></p> <p>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></p> <p>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>

Re-Certification Audit and Scope Change (1 – 2 December 2022)

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

The supply chain activities include in the audit scope:

- Post-Casthouse

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME 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 10 January 2023 – 9 January 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 9 January 2025

CERTIFICATE NUMBER 65



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Shanghai Sunho Aluminum Foil Co., Ltd is a wholly owned subsidiary of Henan Sunho Group Co., Ltd (SZ.000933). The company was established in March 2004. It is located in the Shanghai Pudong Kangqiao industrial Zone, near the intersection of Shenjiang South Road and Xiuyan Road, covers an area of 368 mu, near S20 south loop, 12 km from Pudong International Airport, and adjacent to Shanghai Disneyland.

The Entity is a precision aluminium foil processing, manufacturing and service supplier in China. Products cover a wide range, with a thickness of 0.060mm to 0.0045mm and are widely used in the packaging of food, beverage, cigarettes, medicine and cream products; and for thermal insulation materials, video cables and other industries. Products meet upscale capacitor foil quality and technical index requirements. The market prospect is broad.

The main production equipment of the company is imported equipment of international leading level, three 2,150mm wide foil mills are provided by Siemens-VAI (UK), three Separators and one Doubler are from Kampf-WT Germany, and one Work Roll Grinding machine is from the Herkules Germany. Sunho also owns advanced test and measure devices are from Italy and US, such as universal electronic tension tester, cleanness detector, precision sampling, electronic analyzer, etc.

Sunho Aluminum Foil has passed ISO 9001:2008 quality system, ISO 14001:2004 environmental management system, GMC global manufacturer member certification, fully and strictly implemented ISO 9001, ISO 14000 ISO 50001 and system standards, and implemented lean production management processes.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

OVERALL	
SYSTEMS	High
RISKS	Medium
PERFORMANCE	Low
OVERALL	MEDIUM

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 CoC Management System	Conformance	The Entity has established policies, systems, procedures and processes that comply with ASI Chain of Custody Standard criteria regarding a Management System. The Entity's Management System has the capacity to handle ASI CoC Material. The Entity has an integrated management system underpinned by ISO 9001:2015 The Entity's ISO 9001:2015 certificate is valid for the Certification Period.
1.3 CoC Management System Monitoring	Conformance	The Entity has established mechanisms for the periodic review of the Management System, in line with their ASI management manual. The Entity assesses the effectiveness of the ASI CoC management and addresses potential areas of nonconformance and improvement. The latest management review was conducted in November 2022.
1.4 Management Representative	Conformance	The Entity has appointed a member of management as the responsible person for conformance with the ASI Chain of Custody Standard and has defined roles and responsibilities to manage the CoC system.
1.5 Communications and Training	Conformance	The Entity has delivered training courses to relevant personnel to raise awareness of CoC requirements and ensure competence in their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity has established the record management procedure based on 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 of CoC Material)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's CoC Management Procedure specifies that the Entity will report required information of CoC Material to the ASI Secretariat by 30 June after the end of each calendar year.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as 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 ALUMINIUM

3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

CRITERION	RATING	COMMENT
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has systems in place to ensure that it is 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 and information in the CoC Material Accounting System.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity is certified to the ASI Performance Standard: https://aluminium-stewardship.org/about-asi/asi-members/shanghai-shenhuo-aluminium-foil-co-ltd
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has systems in place to ensure that ASI Aluminium is purchased only from eligible Entities directly or indirectly via a 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.

7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has developed a Suppliers Code of Conduct and a responsible sourcing Policy that addresses anti-corruption. The Entity has a process to qualify suppliers. The responsible sourcing policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has a responsible purchasing Policy that addresses responsible sourcing. All major next tier suppliers are communicated with on the policy and have signed a Commitment Letter of Responsible Purchasing. The responsible sourcing policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has a responsible purchasing Policy that addresses Human Rights Due Diligence. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The responsible sourcing policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has a responsible sourcing policy that addresses Conflict-Affected and High-Risk Areas. Relevant training has been provided to employees. All identified major next tier suppliers are communicated with on the policy and signed the Commitment Letters of Nonconflicted-Mineral. The responsible sourcing policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a responsible sourcing framework for suppliers that includes a risk assessment and qualification process. The Entity has assessed the risks of non-compliance with its responsible sourcing policy by its suppliers of Non-CoC Material. Measurable risk mitigation has been undertaken where risks of adverse impacts are identified. The Entity also conducts second party audits of its major next tier suppliers.

CRITERION	RATING	COMMENT
7.3 Complaints Resolution Mechanism	Conformance	The Entity has a whistleblower / complaints channel to enable employees and external stakeholders to report anonymously potential misconducts. The channel is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016

8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that records Input and Output Quantity of CoC Material/ Eligible Scrap and Non-CoC Material/Scrap by mass.
8.2 Material Accounting Period	Conformance	The Entity's CoC Management Manual has defined the Material Accounting Period as a calendar year: from January 01 to December 31.
8.3 Input and Inflow Quantities	Conformance	The Entity records the Quantities of each CoC Material and Eligible Scrap Input and the Quantities of Non-CoC Material and Recyclable Scrap Material Inflow and determines the Inflow Quantity of Eligible Scrap and Recyclable Scrap Material based on an assessment of Aluminium content.
8.4 Output Quantities of CoC Material	Conformance	In the Entity's Material Accounting System, the available Quantities of CoC Material for Output is determined by the Input Quantities for each CoC Material proportional to the total Inflows of CoC and Non CoC Material by mass.
8.5 Indivisibility of CoC Material	Conformance	The Entity's CoC Management Manual defines that the Output Quantity of CoC Material shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's CoC Management Manual defines that the Entity designate the relevant proportion of Scrap generated in the production processes as Eligible Scrap using the same percentage share as for its Output of ASI Aluminium.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's CoC Management Manual defines that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period. In the Material Accounting System, a formula is set up to provide a warning if the Input Percentage of CoC Materials is exceeded.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established processes within the Material Accounting System to ensure the Internal Overdraw does not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period. There was no Overdraw for the Entity in 2021 or 2022.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has established processes within the Material Accounting System to control the Internal Overdraw under a Force Majeure situation. There was no Overdraw for the Entity in 2021 or 2022.
8.8c Internal Overdraw (Made up within	Conformance	The Entity has established processes within the Material Accounting System to control Internal Overdraw under a Force Majeure situation and the Internal Overdraw shall be made up within the subsequent

CRITERION	RATING	COMMENT
subsequent Material Accounting Period)		Material Accounting Period. There was no Overdraw for the Entity in 2021 or 2022.
8.9a Positive Balance (Carry over)	Conformance	The Entity has established processes within the Material Accounting System to control Positive Balance (carry over). The Entity recorded a Positive Balance in 2021. The Positive Balance is calculated and recorded.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established processes within the Material Accounting System to control Positive Balance (carry over). 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.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity intends to use the CoC Document template defined in the ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product and include a reference number: CoC + SH + year + serial number. All issued CoC Documents have the reference number following the defined rule.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the identity, address and CoC Certification number of the Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the identities and addresses of the customers receiving the CoC Material, and their CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents are reviewed and approved by the responsible persons before sending to customers.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard".

CRITERION	RATING	COMMENT
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the type of CoC Materials in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the mass of CoC Materials in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product. All issued CoC Documents include the mass of total Materials in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product, and include Sustainability Data. The data is based on the Life Cycle Assessment Report which is published on the Entity's official website.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product, and include Sustainability Data.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product, and include Sustainability Data.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product, and. All issued CoC Documents include the Entity's ASI Certification Status for the ASI Performance Standard.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity will issue CoC Documents using the ASI CoC Document template for each lot of CoC Material/product, and can include Supplementary Information. The Supplementary Information will be based on the output of the Entity's ASI Performance Standard management system. No Supplementary Information has been provided in the issued CoC Documents to date as no customer has made such a request.
9.5 Verification of Information	Conformance	The Entity has defined the responsibility and the process to respond to requests for verification of information in CoC Documents issued by the Entity. No verification requests have been received to date.
9.6 Error (Shipping)	Conformance	Integrated with ISO 9001 Quality Management System, the Entity has a process to record the errors, analyse the root cause, and implement associated corrective action to prevent reoccurrence. No errors in the CoC Documents have been found.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has implemented a process to verify the required information in the received CoC Documents. The required information in received CoC Documents has been included.

CRITERION	RATING	COMMENT
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented a process to verify the required information in the received CoC Documents.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has developed a 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.
10.4 Error (Reception)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has a process to record the errors, analyse the root cause, and implement associated corrective action to prevent reoccurrence with suppliers. No errors in CoC Documents have been found in 2021.

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (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. No claims are found to violate the requirements defined in ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has implemented the document and record management procedure 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.
11.1c Claims and Communications (Employee training)	Conformance	The Entity provides the training courses on claims and communications to the relevant employees. Evidence of training conducted ongoing planned training was reviewed.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

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.
3	2 February 2023	Re-Certification Audit - Full Certification. Scope Change to apply CoC Standard V2.