

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Novelis (China) Aluminum Products Co. Ltd

CERTIFICATE  
NUMBER

247

ASI STANDARD

CHAIN OF CUSTODY  
(V2 2022)

CERTIFICATION  
LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

22 DECEMBER 2022

DATE OF EXPIRY

21 DECEMBER 2025

CERTIFIED SINCE

22 DECEMBER 2022

## 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](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at*

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

## CERTIFICATION SCOPE

The manufacture of aluminum automotive sheet for lightweight vehicle structures and body panels. Including:

- Continuous Annealing Solution Heat (CASH) Lines,
- Slitting Line,
- Laser Cutting Line,
- Annealing Furnace

Outsourcing Contractor:

- SuZhou Lilai steel Co., Ltd (苏州利来钢铁有限公司), No. 40 JiangPu Road, Shengpu Town, Industrial park of Suzhou (苏州工业园区胜浦镇江浦路40号), Blank Aluminum sheet tolling service (铝板切割加工服务)

# AUDIT REPORT CHAIN OF CUSTODY STANDARD

## OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis (China) Aluminum Products Co. Ltd
CERTIFICATION SCOPE	<p>The manufacture of aluminum automotive sheet for lightweight vehicle structures and body panels. Including:</p> <ul style="list-style-type: none"><li>- Continuous Annealing Solution Heat (CASH) Lines,</li><li>- Slitting Line,</li><li>- Laser Cutting Line,</li><li>- Annealing Furnace</li></ul> <p>Outsourcing Contractor:</p> <ul style="list-style-type: none"><li>- SuZhou Lilai steel Co., Ltd (苏州利来钢铁有限公司), No. 40 JiangPu Road, Shengpu Town, Industrial park of Suzhou (苏州工业园区胜浦镇江浦路40号), Blank Aluminum sheet tolling service (铝板切割加工服务)</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Chain of Custody Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 3- 4 November 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 6 December 2022</li></ul>
AUDIT SCOPE	<p>The audit scope covers all processes Chain of Custody applied in the Changzhou production facility such as the manufacture of aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification

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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.

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CERTIFICATION PERIOD

22 December 2022 – 21 December 2025

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DUE DATE

21 December 2024

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CERTIFICATE NUMBER

247

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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.

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## ENTITY OVERVIEW

The site is located at No. 19 Xingtang Road, Xin Bei District, Changzhou City, Jiangsu Province, China. Novelis (China) Aluminium Products Co. Ltd manufactures aluminium automotive sheets for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Lines, Laser Cutting Lines and Annealing Furnace.

## 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
<b>SYSTEMS</b>	Medium
<b>RISKS</b>	Medium
<b>PERFORMANCE</b>	Medium
<b>OVERALL</b>	<b>MEDIUM</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. MANAGEMENT SYSTEM AND RESPONSIBILITIES</b>		
1.1 ASI Membership	Conformance	The Entity is an ASI Member in the Production and Transformation category and holds a valid Performance Standard Certification.  <a href="https://aluminium-stewardship.org/wp-content/uploads/2022/05/ASI-Summary-Audit-Report-Novelis-China-Aluminum-Products-Certificate-199-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2022/05/ASI-Summary-Audit-Report-Novelis-China-Aluminum-Products-Certificate-199-PS.pdf</a>
1.2 CoC Management System	Conformance	The Entity has established Policies, systems, procedures, and processes for its Chain of Custody (CoC) Management System to manage the ASI CoC Standard requirements.
1.3 CoC Management System Monitoring	Conformance	The Entity established a process to periodically review the Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance and improvement.
1.4 Management Representative	Conformance	The Entity has appointed a member of management responsible for the implementation of the ASI CoC Standard and has defined the roles and responsibilities to manage the CoC Management System.
1.5 Communications and Training	Minor Non-Conformance	The Entity has provided training to relevant personnel to raise awareness of ASI CoC requirements. The Entity has planned to implement additional training measures that make relevant personnel aware of, and competent in their responsibilities under the ASI CoC Standard, once ASI certified material is available.  However, it was identified communication and training did not reach all relevant personnel regarding the ASI CoC Standard requirements.
1.6 Records Management	Conformance	The Entity maintains up-to-date records as part of its Management System and has established a record management procedure that defines the required retention time.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required

CRITERION	RATING	COMMENT
		information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has established a Chain of Custody Management Procedure that specifies that the Entity will report the required information for CoC Material to the ASI Secretariat within three months after the end of each calendar year.
<b>2. OUTSOURCING CONTRACTORS</b>		
2.1 Certification Scope	Conformance	The Entity has identified the Outsourcing Contractor in its CoC Certification Scope, where the aluminium sheet splitting process is currently managed by an Outsourcing Contractor. The Entity has conducted a risk assessment and a supply chain social responsibility Audit on the sub-Contractor. The Entity has established an Outsourcing Contractor management procedure.
2.2a Control of CoC Material (Legal ownership or control)	Conformance	The Entity has established an Outsourcing Contractor management procedure. All CoC Material shipments, their quantity and receipts are recorded, and ownership of CoC Material shipped to the sub-Contractor belongs to the Entity.  No CoC Material has been shipped to the contractor in 2022.
2.2b Control of CoC Material (No further outsourcing)	Conformance	The Entity issues a procurement contract to the Outsourcing Contractor where they are not allowed to further outsource the processing, handling, or manufacturing of CoC Materials processing. Outsourcing Contractors are subjected to supplier on-site audits to ensure there are no activities linked to further outsourcing.
2.2c Control of CoC Material (Risk assessment)	Minor Non-Conformance	The Entity has established an Outsourcing Contractor management procedure, and the requirements for risk assessments and Outsourcing Contractor audits are specified in an ASI CoC operation manual.  The aluminium sheet splitting process is currently managed by an Outsourcing Contractor. The Entity had conducted the risk assessment and a supply chain social responsibility audit.  However, it was identified the checklist and audit criteria of social responsibility audit for the Outsourcing Contractors that are based on ASI Performance Standard do not cover the management of CoC Materials and was not covered in the audit process.

CRITERION	RATING	COMMENT
2.3 Information on Quantity of CoC Material Output and Returned	Conformance	The Entity has implemented a CoC Material inventory sheet to record the information on the Output Quantity of CoC Material and the Quantity of CoC Material returned to the Entity by the Outsourcing Contractor. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material is available in the Entity's sub-Contractor.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Conformance	The Entity uses the CoC Material inventory sheet to ensure the consistency and balance in the Inflow and Outflow Quantity of CoC Material to/from the Outsourcing Contractor.
2.5 Error (Outsourcing Contractor)	Conformance	The Entity has established a CoC Material management procedure, supplier management procedure and corrective action management procedure including the processes to monitor the incoming/outgoing quantities to/from the Outsourcing Contractor of CoC Material via the CoC Material inventory sheet. If an error is found, the sub-Contractor will be required to correct it.

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

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has implemented a Management System to ensure the production of ASI Aluminium only comes from the Post-Casthouse which is within the Entity's CoC Certification Scope. The ASI Aluminium for Post-Casthouse operations only comes from Novelis Group wholly owned Facilities within the CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity has implemented a Management System to ensure that it produces ASI Aluminium only from Entities Certified against the ASI Performance Standard. All the ASI Aluminium sourced for post-cast house operations is only purchased from ASI Performance and Chain of Custody Certified Facilities.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has a system in place to ensure that it produces ASI Aluminium only from the Entity Certified against the ASI Chain of Custody Standard.



CRITERION	RATING	COMMENT
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has established a Suppliers Code of Conduct that addresses anti-Corruption. The Suppliers Code of Conduct is available at: <a href="https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q">https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q</a>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has established a Suppliers Code of Conduct that addresses responsible sourcing, available at: <a href="https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q">https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q</a>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has established a Suppliers Code of Conduct that addresses Human Rights Due Diligence, available at: <a href="https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q">https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q</a>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has established a Suppliers Code of Conduct that addresses the assessment of Conflict-Affected and High-Risk Areas (CAHRAs), available at: <a href="https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q">https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q</a>
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a Suppliers Code of Conduct that addresses the risk-assessment and qualification process. The Entity has assessed the risks of non-compliance with its Responsible Sourcing Policy by its non-CoC Material suppliers. The Suppliers Code of Conduct is available at: <a href="https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q">https://mp.weixin.qq.com/s/xk0YWIw-RZJa9rObXz-Q0Q</a>
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a mechanism to address complaints and concerns related to ASI. Further information is available at: <a href="https://mp.weixin.qq.com/s/KCiCRDzyoe75ZqdsTnY72w">https://mp.weixin.qq.com/s/KCiCRDzyoe75ZqdsTnY72w</a>
<b>8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM</b>		
8.1 Material Accounting System	Conformance	The Entity establishes a Material Accounting System that records the Input and Output Quantity of CoC Material/Eligible Scrap and Non-CoC Material/Scrap by mass. At the time of this audit, there is no ASI material available in the Entity's supply chain, the simulation case shows the system conforms to ASI CoC requirements.
8.2 Material Accounting Period	Conformance	The Entity has defined within its Chain of Custody Management Manual, the Material Accounting Period is for the calendar year from January 1 to December 31.
8.3 Input and Inflow Quantities	Conformance	The Entity will record the quantities of each CoC Material and Eligible Scrap Input and the quantities of Non-CoC Material and Recyclable Scrap Material Inflow and determine the Inflow quantity of Eligible Scrap and Recyclable Scrap Material based on an assessment of Aluminium content.  At the time of this audit, there is no ASI Material available in the Entity's supply chain.

CRITERION	RATING	COMMENT
8.4 Output Quantities of CoC Material	Conformance	In the Entity's Material Accounting System, the available Quantities of CoC Material for Output will be 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 has defined within its Chain of Custody Management Manual, that the Output Quantity of CoC Material shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity has defined within its Chain of Custody Management Manual, the Entity would designate the relevant proportion of Scraps 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 has defined within its Chain of Custody Management Manual, 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.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has defined within its Chain of Custody Management Manual, that the Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period in the case that the Internal Overdraw has to be made.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has defined within its Chain of Custody Management Manual, that an Internal Overdraw is only permitted when CoC Material has been contracted to be delivered to the Entity, but a Force Majeure situation has prevented timely delivery and the Internal Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has defined within its Chain of Custody Management Manual, that the Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has defined within its Chain of Custody Management Manual, that the carryover of a Positive Balance shall be identified in the Entity's Material Accounting System.
8.9b Positive Balance (Expiry)	Conformance	The Entity has defined within its Chain of Custody Management Manual, that the 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.
<b>9. ISSUING COC DOCUMENTS</b>		
9.1 CoC Document	Conformance	The Entity intends to use the CoC Document template defined in ASI CoC standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.

CRITERION	RATING	COMMENT
9.2a CoC Document Content (Date of issue)	Conformance	The Entity will issue a CoC Document for each lot of CoC Material/Product using the CoC Document template defined in ASI CoC Standard, including the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity intends to use the CoC Document template defined in ASI CoC standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, including the Reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity intends to use the CoC Document template defined in ASI CoC standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, including the issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity will issue a CoC Document for each lot of Material/Product, the CoC Document shall include receiving customer and its CoC Certification number if it is certified against the ASI CoC Standard.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has defined within the Chain of Custody Management Manual, that the sales representative is responsible for verifying the information in the CoC Documents and signing them.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has defined within the Chain of Custody Management Manual, that if the customer requires to issue the CoC Document in its format, the Entity shall follow the requirement. If not, the Entity shall issue a CoC Document for each lot of Material/Product using the CoC Document template defined in ASI CoC Standard, both forms shall include the conformance statement.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity will issue a CoC Document for each lot of Material/Product using the CoC Document template defined in ASI CoC Standard, including the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity will issue a CoC Document for each lot of Material/Product using the CoC Document template defined in ASI CoC Standard, including the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity will issue a CoC Document for each lot of Material/Product using the CoC Document template defined in ASI CoC Standard, including the mass of total material.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity has established a Custody Management Manual, and as such it will not provide the Sustainability Data by default. If a customer submits a request, the Key Account Manager will share the Life Cycle Assessment (LCA) Report with the customer.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity has established a Custody Management Manual, and as such it will not provide the Sustainability Data by default. If a customer submits a request, the Key Account Manager will share the information with the customer, including the origin of the Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity has established a Custody Management Manual, and as such it will not provide the Sustainability Data by default. If a customer

CRITERION	RATING	COMMENT
		submits a request, the Key Account Manager will share the information with the customer, including the information on recycled content.
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Conformance	The Entity has established a Custody Management Manual, which defined the Entity will not provide the Sustainability Data by default. If a customer submits a request, the Key Account Manager will share the information with the customer, including ASI Certification Status.
9.4 Supplementary Information (optional) – Objective evidence	Conformance	The Entity has established a Custody Management Manual, and as such it will not provide the Sustainability Data by default. If a customer submits a request, the Key Account Manager will share the information with the customer and provide objective evidence.
9.5 Verification of Information	Conformance	The Entity has defined the responsibility and the processes to respond to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error (Shipping)	Conformance	The Entity has implemented an integrated Quality Management System, the Entity has a process to record the errors, analyse the root cause, and take the associated correction action to prevent the reoccurrence.

## 10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has implemented the process to verify the required information in the received CoC Documents as required by the ASI Chain of Custody Standard.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented the process to verify the required information in the received CoC Documents as required by ASI Chain of Custody Standard, including verifying the consistency of received CoC Documents with the accompanying CoC Materials.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has implemented a process to verify the supplier CoC Certification Status at:  <a href="https://aluminium-stewardship.org/about-asi/asi-member-listing">https://aluminium-stewardship.org/about-asi/asi-member-listing</a>
10.4 Error (Reception)	Conformance	The Entity has implemented a process to record the errors, inform the supplier and require them to take the associated correction action to prevent the reoccurrence.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has defined within its ASI CoC Management Manual, that all claims and communications shall follow the ASI Claims Guide including communication with ASI Secretariat.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has committed to following the requirements on Claims and Communication, with assigned roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. Claims and/or representations made by the Entity are supported by verifiable evidence.

CRITERION	RATING	COMMENT
11.1c Claims and Communications (Employee training)	Conformance	The Entity has provided training courses on Claims and has communicated the requirements to relevant employees to conduct their tasks.

#### 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	22 December 2022	Initial Certification Audit – Full Certification
1	3 April 2022	To include Criterion 3.3b and 3.3c