

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

YUNNAN HAOXIN ALUMINUM FOIL CO., LTD.

CERTIFICATE
NUMBER

174

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

13 JANUARY 2022

DATE OF EXPIRY

12 JANUARY 2025

CERTIFIED SINCE

13 JANUARY 2022

AUTHORISED BY

A handwritten signature in white ink, consisting of stylized initials and a long horizontal stroke.

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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

Aluminium re-melting, refining and semi-fabrication activities, associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, China.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Yunnan Haoxin Aluminum Foil Co., Ltd
ENTITY NAME	Yunnan Haoxin Aluminum Foil Co., Ltd.
CERTIFICATION SCOPE	Aluminium re-melting, refining and semi-fabrication activities, associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• 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 (24 – 26 November 2021)• Surveillance Audit (16 – 17 February 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 24 – 26 November 2021 (Initial Certification Audit)• 16 – 17 February 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 25 December 2021 (Initial Certification Audit)• 23 April 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 26 November 2021)</u></p> <p>The audit scope includes aluminium re-melting, refining and semi-fabrication associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, China.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse <p>All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.</p>

Surveillance Audit (16 – 17 February 2023)

The audit scope includes aluminium re-melting, refining and semi-fabrication associated with the manufacture of aluminium foil at the Yunnan Haoxin Aluminum Foil plant, China.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

All relevant criteria in the ASI Chain of Custody 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

13 January 2022 – 12 January 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

12 January 2025

CERTIFICATE
NUMBER

174

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Yunnan Haoxin Aluminum Foil Co., Ltd is an ASI Member committed to complying with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category and holds an ASI Performance Standard Certification: https://aluminium-stewardship.org/about-asi/asi-members/yunnan-haoxin-aluminum-foil-co-ltd
1.2 Management system	Conformance	The Entity has established a Management System to address all applicable requirements of the ASI Chain of Custody Standard. The ASI System Manual and relevant procedures and records are established, which include the purpose, scope, policies, responsibilities, risk assessment, improvement objectives, training, communication, internal audit, corrective action plan, document and record keeping, supplier management and workflow of the ASI Chain of Custody (CoC) system.
1.3 Management system reviews	Conformance	The Entity has annually conducted an internal audit and management review to address potential areas of non-conformance and improvement and seek continual improvement for Chain of Custody management.
1.4 Management representative	Conformance	The Entity has defined the roles and responsibilities to manage the Chain of Custody system and appointed the Vice General Manager of the Foil Unit as the responsible person for the ASI Chain of Custody Standard implementation. This role is also responsible for the implementation of the ASI Performance Standard.
1.5 Training	Conformance	The Entity has delivered training to relevant personnel to raise awareness of the ASI Chain of Custody Standard requirements. The annual training plan, training materials and training records are maintained, with the latest training conducted in November 2022.
1.6 Record keeping	Conformance	The Entity's ASI System Manual defines the retention time, and all records are retained for at least five years.
1.7a Reporting to ASI (Inputs and Outputs)	Minor Non-Conformance	The Entity's ASI System Manual defines that the Entity will report required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year. The reporting

CRITERION	RATING	COMMENT
		information includes the Input and Output Quantities of CoC Material/s over the calendar year. The Entity reported the required CoC information for 2022 to the ASI Secretariat in February 2023. However, the reporting of 2021 CoC information was submitted in July 2022, which was past the due date.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity's ASI System Manual defines that the Entity will report required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year. The reporting information includes the Input Percentage/s calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's ASI System Manual defines that the Entity will report required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year. The reporting information includes the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity's ASI System Manual defines that the Entity will report required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year. The reporting information includes the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity's ASI System Manual defines that the Entity will report required information on CoC Material to the ASI Secretariat within three months after the end of each calendar year. The reporting information includes the total Input Quantity of Eligible Scrap, with a breakdown by Post-Consumer Scrap and Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity, in the calendar year.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System and ASI Credits from Casthouses will not be reported.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System and ASI Credits from Casthouses will not be reported.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.2a Control of CoC Material	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.3 Output Quantity	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.4 Verification and record-keeping	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.5 Error management	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
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	Conformance	Internal scrap purchased Aluminium ingots from Dross and purchased scrap Aluminium wires are used by the Entity as Input to the Aluminium Re-melting/Refining process, which is included in the Entity's ASI Chain of Custody Certification Scope. The Entity has robust processes in place to monitor the quantities of Recycled Aluminium and designated Eligible Inputs and Non-CoC Material in its Material Accounting System.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Conformance	Internal scrap purchased Aluminium ingots from Dross and purchased scrap Aluminium wires are used by the Entity as Input to the Aluminium Re-melting/Refining process, which is included in the

CRITERION	RATING	COMMENT
		Entity's ASI Performance Standard Certification Scope. Please refer to the Certificate: https://aluminium-stewardship.org/about-asi/asi-members/yunnan-haoxin-aluminum-foil-co-ltd The Entity has robust processes in place to monitor the quantities of Recycled Aluminium and designated Eligible Inputs and Non-CoC Material in its Material Accounting System.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity's Material Accounting System is designed to control and account for Eligible Scrap coming into the value chain. Only Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity or Aluminium recovered from Dross and treated Dross residues that are subject to supplier Due Diligence is considered Eligible Scrap.
4.2b Post-Consumer Scrap	Conformance	The Entity's Material Accounting System is designed to control and account for Eligible Scrap coming into the value chain. Only Post-Consumer Scrap that is subject to supplier Due Diligence and assessed by the Entity to be Post-Consumer in origin is considered Eligible Scrap.
4.3a Supplier records	Conformance	The Entity has several scrap material suppliers, and it has a system to record their identities and principles. The Entity has investigated all the places of operation of all scrap material suppliers and has recorded related information in the internal system.
4.3b Cash payments	Conformance	All financial transactions with direct suppliers of scrap materials are made by bank transfer and no cash payments are made. The Entity defines the financial threshold under Applicable Law or US\$10,000 (or equivalent), where the cash payment is carried out in a single operation or in several operations that are linked.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Conformance	The Entity has established processes to ensure that production of ASI Aluminium is only from the Casthouse that is within the Entity's CoC Certification Scope.
5.1b ASI Performance Standard - Casthouses	Conformance	The Entity has implemented a system to trace the sources of Input, and only Aluminium from the Casthouse that is within the Entity's CoC Certification Scope. The Entity's Casthouse is certified against the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Entity has implemented a system to link and trace the Input Quantity of CoC Material of each

CRITERION	RATING	COMMENT
		production process and has a procedure on how to trace material. The Entity has established an offline system to track CoC Material and the traceability information can be linked to the system.

6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity has implemented a system to ensure it produces ASI Aluminium only from the Post-Casthouse Facility which is within the Entity's CoC Certification Scope. At present, the Entity only allows ASI Aluminium from the Casthouse that is within the Entity's CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity has implemented a process to ensure only Aluminium from an Entity with a valid ASI Performance Standard certificate is sourced.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has implemented a system to ensure it sources ASI Aluminium only from an ASI CoC Certified Entity. Currently, the Entity only sources ASI Aluminium from the Casthouse within the Entity's CoC Certification Scope. However, Due Diligence would be conducted for Input material Post-Casthouse to ensure only Aluminium from an Entity with a valid ASI CoC Certification is sourced.

7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has established an Anti-Corruption Policy, covering the ASI Chain of Custody Standard requirement of Anti-Corruption. All major next-tier suppliers have received communication about the policy and signed integrity contracts.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established a Responsible Purchasing Policy, covering the environmental, social and governance aspects for suppliers and the ASI Chain of Custody Standard requirement for Responsible Sourcing. All major next-tier suppliers have received communication on the policy and must sign a commitment letter to comply with the policy.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established a Responsible Purchasing Policy, covering the ASI Chain of Custody Standard requirement for Human Rights Due Diligence. All major next-tier suppliers have received communication on the policy and must sign a commitment letter to comply with the policy.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has established a mechanism to manage the minerals from Conflict-Affected and High-Risk Areas (CAHRAs), covering the ASI Chain of Custody Standard requirement of CAHRAs. The relevant

CRITERION	RATING	COMMENT
		training course is provided to employees. All major next-tier suppliers have received communication on the policy and must sign a commitment letter to comply with the policy.
7.2 Risk assessment	Minor Non-Conformance	The Entity has classified its suppliers based on the outcome of a risk assessment. High-risk suppliers sign the ASI commitment letter and are audited regularly according to Due Diligence requirements. Low-risk suppliers sign the ASI commitment letter and respond to SAQ (Self-Assessment Questionnaire) against the ASI requirements. The Entity has received signed commitments and conducted audits for all high-risk suppliers in 2022, which cover the sources of scrap for Recycled Aluminium suppliers. However, the Entity has not issued SAQs for the low-risk suppliers. According to the internal plan, the SAQs would have commenced in November 2022, but due to the impact of COVID-19, has been postponed until March 2023.
7.3 Complaints mechanism	Conformance	The Entity has established a complaints mechanism that allows interested parties to voice concerns about non-compliance with its responsible sourcing policy in its Aluminium Supply Chain. The complaints channels, including email and hotline, are published in the annual Sustainability Report: https://ylgf.chinalco.com.cn/xwzx/ywgg/202205/P020230217488173962437.pdf
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established an offline system to record the Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The offline system automatically alerts the Entity of the balance. The information in the offline system can be linked to the Entity's Manufacturing Execution System (MES).
8.2a Post-Consumer Scrap	Conformance	The Entity has a MES that records the Input Quantity and Output Quantity of Post-Consumer Scrap by mass.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has a MES that records the Input Quantity and Output Quantity of Pre-Consumer Scrap by mass.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Quantity of Eligible Scrap generated by its manufacturing processes and other companies will be recorded in the MES. The Entity has a process to ensure all Eligible Scrap is only from CoC Certified suppliers.

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	The Entity has established a manual to calculate and record the Input Percentage in compliance with the ASI Chain of Custody Standard. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Conformance	The Entity has established a manual to calculate and record the Input Percentage from Aluminium Re-Melting/Refining in compliance with the ASI Chain of Custody Standard. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.6 Output Quantity determination	Conformance	The Entity has a MES in compliance with ASI Chain of Custody Standard requirements to determine the Output Quantity. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.7 Output Quantity designation	Conformance	The Entity has a MES (Manufacturing Execution System) in compliance with ASI Chain of Custody Standard requirements, which defines how to designate the Output Quantity of CoC Material. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity has a MES (Manufacturing Execution System) in compliance with ASI Chain of Custody Standard requirements, which defines how to designate the Output Quantity of Pre-Consumer Scrap. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.9 Outputs not exceed Inputs	Conformance	The Entity's MES (Manufacturing Execution System) has the capacity to ensure that the total Output of CoC Material and Eligible Scrap does not exceed the Input Percentage as applied to the total Input of CoC Material and Eligible Scrap over the Material Accounting Period. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.

CRITERION	RATING	COMMENT
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established a manual to ensure that the Internal Overdraw does not exceed 20% of the total Input Quantity of CoC Material in the Material Accounting Period. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC Material was available in the Entity's supply chain. The Entity has a formal plan to review the balance in the monthly quality meeting to ensure the Overdraw does not exceed 20%.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established a manual to ensure that the Internal Overdraw does not exceed 20% of total Input CoC Material in the Material Accounting Period and the Overdraw can only be caused by a force majeure situation. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a manual to ensure that the Internal Overdraw does not exceed 20% of the total Input CoC Material in the Material Accounting Period and shall be made up within the subsequent Material Accounting Period. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.11a Positive Balance (carry over)	Conformance	The Entity has a MES (Manufacturing Execution System) to manage a Positive Balance. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
8.11b Positive Balance (expiry)	Conformance	The Entity has a MES (Manufacturing Execution System) to manage a Positive Balance and the policy defines that a Positive Balance should be carried over to the subsequent Material Accounting Period before 31 December of each year. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has implemented a system to compile CoC Documents for each shipment and transfer, ensuring that these are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.

CRITERION	RATING	COMMENT
9.2a Date of issue	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the date of issue is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2b Reference number	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the reference number is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2c Issuing Entity	Conformance	The Entity uses the ASI CoC Document template stating the identity, address and CoC Certification number of the Entity when issuing the CoC Document. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC Material was available in the Entity's supply chain.
9.2d Receiving customer	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2e Responsible employee	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody, the responsible employee can verify the information included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2f Conformance statement	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard" is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2g Type of CoC Material	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the types of CoC Material in the shipment are included. At the time of the audit, there was no example of

CRITERION	RATING	COMMENT
		effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2h Mass of CoC Material	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, and the mass of CoC Material is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.2i Mass of total material	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, and the mass of total Material is included. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.3a Sustainability Data (optional)	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, the optional Sustainability Data is included. The Entity has established a system to calculate the Greenhouse Gases (GHG) emissions of Scope 1 and Scope 2 for ASI Aluminium. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.3b Sustainability Data (passing on)	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, and optional Sustainability Data is included. The Entity has established a system to calculate the GHG emissions of Scope 1 and Scope 2 for ASI Aluminium. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, including the ASI Certification status. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
9.4 Supplementary Information (optional)	Conformance	The Entity uses the ASI CoC Document template, as provided in the ASI Chain of Custody Standard, there is a column for Supplementary Information in the document template, and the Entity can provide the Supplementary Information per requirements to the customer. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.

CRITERION	RATING	COMMENT
9.5 Response to verification requests	Conformance	The Entity has established processes and assigned responsibility for responding to the verification of information in CoC Documents issued by the Entity. The contact for the responsible person is indicated in the CoC Document template. At the time of the audit, there was no example of effective implementation of the system as no ASI CoC Material was available in the Entity's supply chain.
9.6 Error management	Conformance	The Entity integrates error management with its current processes under ISO 9001 to manage the error and prevent the recurrence.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has established processes and assigns responsibility to verify the information on received CoC Documents. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
10.2 Verify consistency with shipments	Conformance	The Entity has established processes and assigns the responsibility to verify the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has assigned a Quality Department Specialist to check the ASI website regularly to verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap.
10.4 Error management	Conformance	The Entity integrates error management with its current processes under ISO 9001 which was robust to document errors, corrective actions, and any potential preventive measures to meet the ASI Chain of Custody Standard requirement.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System - allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.

CRITERION	RATING	COMMENT
11.1d No Positive Balance of ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3a CoC Certification Scope - purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3b Material Accounting System - purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
11.3g Five year maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credits System.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has established the Claims and Communications Procedure according to the ASI Chain of Custody Standard requirement. At the time of the audit, there was no example of effective implementation of the system as no CoC Material was available in the Entity's Supply Chain.

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	The Entity has established the Claims and Communications Procedure. The Executive Director is responsible for ensuring compliant communication with the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity provides training courses on claims and communications to relevant employees. Employees interviewed understood the requirement of the Claims and Communication Procedure.

Document Control and Version History

Revision	Date	Notes
0	12 January 2022	Initial Certification Audit - Full Certification
1	8 May 2023	Surveillance Audit