

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Kunshan Aluminium Co., Ltd.

CERTIFICATE NUMBER

95

ASI STANDARD

CHAIN OF  
CUSTODY  
(V2 2022)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

8 SEPTEMBER 2023

DATE OF EXPIRY

7 SEPTEMBER 2026

CERTIFIED SINCE

8 SEPTEMBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Ho', with a long horizontal line extending to the right.

CERTIFICATION SCOPE

Kunshan Aluminium's facility at No  
269, Nijiabang Road, Luyang,  
Zhoushi Town, Kunshan City,  
Jiangsu Province, China.

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)*

# AUDIT REPORT

## CHAIN OF CUSTODY

### STANDARD

#### OVERVIEW

MEMBER NAME	Kunshan Aluminium Co., LTD.
ENTITY NAME	Kunshan Aluminium Co., Ltd.
CERTIFICATION SCOPE	Kunshan Aluminium's facility at No 269, Nijiabang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province, China.
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 (27 – 29 July 2020)</li><li>• Surveillance Audit (12 – 12 August 2022)</li><li>• Re-Certification Audit and Scope Change (5 – 7 June 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 27 – 29 July 2020 (Initial Certification Audit)</li><li>• 12 – 12 August 2022 (Surveillance Audit)</li><li>• 5 – 7 June 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 27 August 2020 (Initial Certification Audit)</li><li>• 8 November 2022 (Surveillance Audit)</li><li>• 26 July 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (27 – 29 July 2020)</u></p> <p>The audit scope included the following: Kunshan Aluminium's facility at No 269, Nijiabang Road, Luyang, Zhoushi Town, Kunshan City, Jiangsu Province.</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 Chain of Custody Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (12 – 12 August 2022)</u></p> <p>The audit scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.</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 Chain of Custody Standard were included in the Audit Scope.</p>

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Re-Certification Audit and Scope Change (5 - 7 June 2023)

The audit scope covers the operations at Kunshan Aluminium Co., Ltd., including the development and production of ultra-wide and ultra-thin aluminium foil and non-ferrous metal composite materials, and sales of self-produced products.

The supply chain activities included in the audit scope:

- Post-Casthouse

All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

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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 25 August 2023 - 24 August 2026

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DUE DATE 24 August 2025

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CERTIFICATE NUMBER 95

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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

Kunshan Aluminium Co., Ltd. was founded in July 2004. It is jointly funded by Hanjiang Group Company Holding and Hong Kong Hanhe Industrial Development Co., LTD, with registered capital of 443.8 million yuan and a project investment of 960 million yuan. The company is located in Kunshan City, Jiangsu Province, China with geographical, human resources, and logistics (seaport) advantages.

The company is a professional aluminium foil manufacturing enterprise, covering an area of 135,000 square meters with the main plant covering 45,000 square meters. The company uses world-class production equipment by ACHENBACH, KAMPF /WT, HERKULES and other manufacturers. The company's annual output of thin aluminium foil is 35,000 tonnes, which is used for food packaging, cigarettes, medicine, daily necessities, cosmetics and other high-grade packaging foil and electric power and electronic industry foil.

## 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 active ASI Member committed to complying with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category:  <a href="https://aluminium-stewardship.org/about-asi/asi-members/kunshan-aluminium-co-ltd/">https://aluminium-stewardship.org/about-asi/asi-members/kunshan-aluminium-co-ltd/</a>
1.2 CoC Management System	Conformance	The Entity has established Policies, systems, procedures and processes that comply with the ASI Chain of Custody Standard criteria regarding a Management System. The Management System can handle CoC Material. The Entity has an integrated Management System underpinned by ISO 9001. The Entity's ISO 9001 certificate was issued by an accredited third party and is valid within the Certification Period.
1.3 CoC Management System Monitoring	Conformance	The Entity has established a process to review the Management System at least every 12 months, to assess the effectiveness of the Management System and address potential areas of non-conformance and improvement. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 Quality Management System.
1.4 Management Representative	Conformance	The Entity has nominated the Vice General Manager as the ASI Management Representative to have overall responsibility for the implementation of and conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has established and implemented communication and training measures that make relevant personnel aware of and competent in their responsibilities.
1.6 Records Management	Conformance	The Entity has established the Record Management Procedure based on ISO 9001 to maintain records 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	Annual reporting processes have been developed and implemented. There was no CoC Material in the Entity's supply chain and the Input and Output Quantity in 2022 was 0. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable as the Entity does not engage in Aluminium Re-melting/Refining, and no scrap Aluminium was purchased or used.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	Annual reporting processes have been developed and implemented. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023. As no CoC Material are available in the Entity's supply chain, all Inflow and Outflow is Non-CoC Material, and relevant data is reported to the ASI Secretariat.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	Annual reporting processes have been developed and implemented. There was no CoC Material in the Entity's supply chain and there was no Positive Balance in 2022. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023.
1.7e Reporting to ASI (Positive Balance used)	Conformance	Annual reporting processes have been developed and implemented. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023. As there was no CoC Material available in the Entity's supply chain, no Internal Overdraw occurred in 2022.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	Annual reporting processes have been developed and implemented. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023. As there was no CoC Material available in the Entity's supply chain, no Internal Overdraw occurred in 2022.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	Annual reporting processes have been developed and implemented. The Entity reported the Inputs and Outputs of ASI Aluminium to the ASI Secretariat in April 2023.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for 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 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 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 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 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 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 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.
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CRITERION	RATING	COMMENT
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.
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

CRITERION	RATING	COMMENT
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 established a system that ensures the production of ASI Aluminium only from the Facilities that are within the Entity's CoC Certification Scope. The management responsibilities are assigned to the Purchasing Department.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity has established a system to ensure that it produces ASI Aluminium only from the Facilities certified against the ASI Performance Standard.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has established a system to ensure that ASI Aluminium is purchased only from eligible Entities/Facilities directly or indirectly via a metals trader and warehouse. At the time of the Audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.

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

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has implemented the Responsible Sourcing Policy, which addresses anti-Corruption. All identified major next tier suppliers are informed about the Policy, and a Commitment Letter of Business Ethics is signed by suppliers. The Responsible Sourcing Policy is published in the Sustainability Report: <a href="http://www.akscn.net/Upload/files/ksly202306-09.pdf">http://www.akscn.net/Upload/files/ksly202306-09.pdf</a>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has implemented the Responsible Purchasing Policy, which addresses the requirements for responsible sourcing. All major next tier suppliers are informed about the Policy and have signed a Commitment Letter of Responsible Purchasing. The Responsible Sourcing Policy is published in the Sustainability Report: <a href="http://www.akscn.net/Upload/files/ksly202306-09.pdf">http://www.akscn.net/Upload/files/ksly202306-09.pdf</a>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has implemented the Responsible Purchasing Policy, which addresses the requirements for Human Rights Due Diligence. All identified major next tier suppliers are informed about the Policy and they signed a Commitment Letters of Responsible Purchasing. The Responsible Sourcing Policy is published in the Sustainability Report: <a href="http://www.akscn.net/Upload/files/ksly202306-09.pdf">http://www.akscn.net/Upload/files/ksly202306-09.pdf</a>



CRITERION	RATING	COMMENT
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has implemented the Responsible Sourcing Policy, which addresses the requirements for Conflict-Affected and High-Risk Areas. The relevant training course is provided to employees. All identified major next tier suppliers are informed about the Policy and have signed a Commitment Letter of Non-Conflict-Mineral. The Responsible Sourcing Policy is published in the Sustainability Report:  <a href="http://www.akscn.net/Upload/files/ksly202306-09.pdf">http://www.akscn.net/Upload/files/ksly202306-09.pdf</a>
7.2 Risk Assessment and Mitigation	Conformance	The Entity undertakes risk assessments of its suppliers and completes risk mitigation efforts where relevant. The Entity also conducts second party audits of its major next tier suppliers.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a Complaints Resolution Mechanism including a 'whistleblower'/complaints channel to enable employees and external Stakeholders to anonymously report potential misconduct. The following channels are available to all Stakeholders: hotline: +86-0512-57647862 and mailbox: <a href="mailto:aksjw@akscn.net">aksjw@akscn.net</a> . The information can be accessed via the Sustainability Report:  <a href="http://www.akscn.net/Upload/files/ksly202306-09.pdf">http://www.akscn.net/Upload/files/ksly202306-09.pdf</a>
<b>8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM</b>		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that safeguards the integrity of CoC Material and Eligible Scrap Mass Balance within the Certification Scope. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.2 Material Accounting Period	Conformance	The Material Accounting Period is defined as a calendar year, in accordance with the Entity's financial year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a Material Accounting System that can record Input and Inflow Quantities of CoC Material and Non-CoC Material by mass. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Material Accounting System that can use the Input Quantities for each CoC Material to determine the available Quantities of CoC Material for Output, proportional to total Inflows of CoC and Non-CoC Materials, by mass in the given Material Accounting Period.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Output Quantity can be designated as 100% CoC Material as per the Material Accounting System procedures and processes. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	Each transfer of the Eligible Scrap from the Entity shall be accompanied by a CoC Document, and the calculation of the percentage follows the formula defined in the ASI Chain of Custody Standard. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System is developed to have updated information on the inventory balance frequently to guarantee the Outputs do not exceed Inputs. This was evidenced in the ASI CoC Management Manual and the simulation cases.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period and is defined in the Material Accounting System. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has established a process in the Material Accounting System to control the Internal Overdraw under a Force Majeure situation in compliance with the ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has established a process in the Material Accounting System to control the Internal Overdraw under a Force Majeure situation in compliance with the ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.9a Positive Balance (Carry over)	Conformance	The Entity has established a process in the Material Accounting System to control the Positive Balance (carry over) in compliance with the ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established a process in the Material Accounting System to control the Positive Balance (carry over) in compliance with the ASI Chain of Custody Standard requirements. This was evidenced in the ASI CoC Management Manual and the simulation cases.
<b>9. ISSUING COC DOCUMENTS</b>		
9.1 CoC Document	Conformance	The Entity has a system that can produce CoC Documents for shipment and transfer of CoC Material, ensuring that these are controlled, issued and stored as per ASI Chain of Custody Standard requirements. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity will issue CoC Documents for each CoC Material/product defined in the ASI Chain of Custody Standard, and include their date of issue. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2b CoC Document Content (Reference number)	Conformance	The Entity will issue CoC Documents for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include a reference number: CoC + invoice number. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the details of the issuing Entity. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.

CRITERION	RATING	COMMENT
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the details of the receiving customer. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the responsible employee. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include a conformance statement. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the type of CoC Material. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the mass of CoC Material. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include mass of total material. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	If a customer raises a request, the average (preferably cradle-to-gate) carbon footprint of the CoC Material and accounting method applied would be shared with the customer.
9.3b Sustainability Data (optional) - Origin information	Conformance	If a customer raises a request, information including the origin of the Aluminium would be shared with the customer.
9.3c Sustainability Data (optional) - Recycled content	Conformance	If a customer raises a request, the information on recycled content including methodology regarding Pre-Consumer Scrap and Post-Consumer Scrap of the CoC Material would be shared with the customer.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity will issue a CoC Document for each CoC Material/product defined in the template in the ASI Chain of Custody Standard, and include the ASI Certification Status.

CRITERION	RATING	COMMENT
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity has established, implemented and maintained a Management System against the ASI Performance Standard, including the calculation of GHG emissions, and the information in the CoC Documents is based on the output of the Management System. At the time of the Audit, there were no examples of effective implementation of the system, as there was no sourcing and transfer of CoC Material.
9.5 Verification of Information	Conformance	The Entity defines the responsibility and the process to respond to the requests for verification of information in CoC Documents issued by the Entity. This was evidenced in the ASI CoC Management Manual.
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 take the associated corrective action to prevent a reoccurrence. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 Quality Management System.

## 10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has implemented a process to verify the required information in received CoC Documents. This was evidenced in the ASI CoC Management Manual.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented a process to verify the required information in received CoC Documents. This was evidenced in the ASI CoC Management Manual.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has implemented a process to verify the supplier's CoC Certification Status. This was evidenced in the ASI CoC Management Manual.
10.4 Error (Reception)	Conformance	Integrated with ISO 9001 Quality Management System, the Entity has established a process to record the errors, analyse the root cause, and take the associated corrective action to prevent their reoccurrence with suppliers. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 Quality Management System.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity's ASI CoC Management Manual defines the process for the Entity to make claims and/or representations about CoC Material outside of CoC Documents, and authorised personnel will confirm these claims are made in a manner and form consistent with the ASI Claims Guide. No claim has been made to date, and there is no CoC Material in the Entity's supply chain.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity assigns roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide, and that claims and/or representations made are supported by verifiable evidence. At the time of the audit, there were no examples of effective implementation of the system as there is no ASI CoC Material in the Entity's supply chain.

CRITERION	RATING	COMMENT
11.1c Claims and Communications (Employee training)	Conformance	The Entity provides training courses on claims and communication to the relevant employees.

#### 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	8 September 2020	Issued (Full Certification)
1	16 December 2022	Surveillance Audit
2	20 October 2023	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply V2.