

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Suntown Technology Group Corporation Limited

CERTIFICATE NUMBER

366

ASI STANDARD

CHAIN OF CUSTODY  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED AUDITING  
FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

14 MARCH 2024

DATE OF EXPIRY

13 MARCH 2027

CERTIFIED SINCE

14 MARCH 2024

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Suntown Technology Group Corporation Limited including the aluminium casthouse, re-melting, refining and material conversion activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).

# AUDIT REPORT

## CHAIN OF CUSTODY

### STANDARD

#### OVERVIEW

MEMBER NAME	Suntown Technology Group Corporation Limited
ENTITY NAME	Suntown Technology Group Corporation Limited
CERTIFICATION SCOPE	Suntown Technology Group Corporation Limited including the aluminium casthouse, re-melting, refining and material conversion activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul>
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none"><li>Re-Certification Audit and Scope Change - expired Certificate</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>29 February – 3 March 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 March 2024</li></ul>
AUDIT SCOPE	<p>Suntown Technology Group Corporation Limited including the aluminium re-melting, re-finishing and re-cycling and semi-fabrication activities associated with the manufacture of aluminium foil at the sites in Changsha and Changde (China).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul> <p>All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> 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.</li></ul>

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The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION PERIOD 14 March 2024 – 13 March 2027

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DUE DATE 13 September 2025

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CERTIFICATE NUMBER 366

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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 Entity was established in 2003 and is primarily engaged in the production of double-zero Aluminium foil and Aluminium formwork for construction. It operates two production Facilities in Changsha and Changde, Hunan Province.

The Changde Facility is a Primary Aluminium smelting and casting rolling plant, and the Changsha Facility is dedicated to Aluminium foil cold rolling and slitting. The Changsha Facility covers an area of 1,640 acres and has the capacity to produce 250,000 tonnes of high-precision aluminium strip and foil annually, as well as 100,000 tonnes of construction aluminium formwork. The Changde Facility covers an area of 2,450 acres and has an annual production capacity of 220,000 tonnes for casting and rolling coils, and 140,000 tonnes for smelting and casting.

## 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>	High
<b>OVERALL</b>	<b>MEDIUM</b>

## FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an active ASI Member committed to comply with ASI' s membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category. <a href="https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited#">https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited#</a>
1.2 CoC Management System	Conformance	The Entity has established Policies, systems, Procedures and processes that can comply with the ASI Chain of Custody Standard requirements regarding a Management System. The Entity's Management System has the capacity to handle ASI CoC Material. The integrated Management System is underpinned by ISO 9001. The Entity's ISO 9001 certificate is valid for the Certification period.
1.3 CoC Management System Monitoring	Conformance	The Entity has established mechanisms for the periodic review of the Management System, in line with their ASI Management Manual, to assess its effectiveness and address potential areas of non-conformance and improvement. The latest management review was conducted on in February2024.
1.4 Management Representative	Conformance	The Entity has appointed a member of management as the responsible person for implementation of the requirements of the ASI CoC Standard, and the roles and responsibilities have been defined.
1.5 Communications and Training	Conformance	Based on the ISO 9001 certified Management System, the Entity has established and implemented an internal training management process that addresses the training procedures and content related to ASI CoC Standard requirements. Training is primarily divided into two categories, including basic knowledge training for new employees, and specialised training for employees in relevant positions within the Procurement, Sales, and Production Departments Training is performed accordingly, and the training plan, training materials and training records are maintained by the Entity.
1.6 Records Management	Conformance	The Entity maintains up-to-date records (Management System) covering all applicable requirements of the ASI CoC Standard. The Entity's Records Management Procedure defines the required retention time.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has reported the necessary information, including Input and Output Quantities of CoC Material during the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes with Input Quantity of 6,510 tonnes of CoC Materials and zero Output Quantity.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has reported the necessary information, including Input and Output Quantities of Eligible Scrap during the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes Input Quantity of 6,510 tonnes of Eligible Scrap with no Eligible Scrap Output.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has reported the necessary information, including the Inflow and Outflow Quantities of Non-CoC Material during the previous calendar year to the ASI Secretariat within six months after the end of each calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has reported the necessary information, including the maximum Positive Balance carried over to the subsequent Material Accounting Period to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes a Positive Balance of 6,380 tonnes.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has reported the necessary information, including the Positive Balance used in the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes no Positive Balance of ASI Aluminium used.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has reported the necessary information, including the Internal Overdraw drawn down from the subsequent Material Accounting Period to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes no Internal Overdraw.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has reported the necessary information, including the maximum Positive Balance carried over from the subsequent Material Accounting Period to the ASI Secretariat within six months after the end of each calendar year. The information reported for 2022 includes the internal flow of CoC Materials of 6,510 tonnes.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors, as the entire production is carried out internally without any outsourcing within the supply chain.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors, as the entire production is carried out internally without any outsourcing within the supply chain.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors, as the entire production is carried out internally without any outsourcing within the supply chain.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors, as the entire production is carried out internally without any outsourcing within the supply chain.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	The Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors.
2.4 Consistency in Inflow and Outflow Quantity of	Not Applicable	The Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors.

CRITERION	RATING	COMMENT
CoC Material to/from Outsourcing Contractor		
2.5 Error (Outsourcing Contractor)	Not Applicable	The Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors.
<b>3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM</b>		
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.
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity has established appropriate processes and systems to ensure that ASI Aluminium is exclusively produced by Facilities within the Entity's CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The established system ensures that ASI Aluminium is exclusively produced from Facilities that are Certified against the ASI Performance Standard. The verification of the Entity's Material Accounting System, in Excel format, confirms this adherence.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has implemented a Material Accounting System that is designed to manage and track Eligible Scrap introduced into the value chain. At present, the Entity does not purchase Pre-Consumer Scrap.

CRITERION	RATING	COMMENT
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity has implemented a Material Accounting System that is designed to manage and track Eligible Scrap introduced into the value chain. The Entity conducts Due Diligence on all Post-Consumer Scrap in accordance with ASI requirements.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity, as the Entity has not purchased Recycled Aluminium from Aluminium ash and other Aluminium-containing wastes.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established a Supplier Management Procedure and maintains a repository of qualified supplier records. Information about all suppliers, including details of Recyclable Scrap Material suppliers, is documented within the supplier files.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity adheres to a rigorous financial and cash management system, mandating that all transactions, including those with direct suppliers of Recyclable Scrap Material, must be conducted through bank transfers.
<b>5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The observed system ensures production of ASI Aluminium only from the Casthouse that is within the Entity's CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The observed system ensures production of ASI Aluminium only from the Casthouse that is within the Entity's ASI Performance Standard Certification Scope. The certification information of the Entity's ASI Performance Standard is available at: <a href="https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited">https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited</a>
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has an adequate and effective Supply Chain Control and Procurement Management Procedure to ensure all ASI Aluminium are sourced either directly or indirectly from an ASI CoC Certified Entity.
5.2 Unique Identification	Conformance	The Entity has established a system to ensure that unique identification numbers, either physically stamped and printed on ASI Aluminium Products' packaging, can be linked to their Material Accounting System.
<b>6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM</b>		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The observed system ensures production of ASI Aluminium only from the Post-Casthouse that is within the Entity's CoC Certification Scope.
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 Facility certified against the ASI Performance Standard. The Entity has obtained ASI Performance Standard certification, and the current certificate is valid until June 2024: <a href="https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited">https://aluminium-stewardship.org/about-asi/members/Suntown-Technology-Group-Corporation-Limited</a>



CRITERION	RATING	COMMENT
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has established a system to ensure that the ERP system traces ASI Aluminium with a unique identifier, regardless of whether it comes from either an ASI CoC Certified Entity or a Trader capable of providing a CoC Document. Currently, due to the significantly larger quantity of Eligible Scrap purchased by the Entity compared to the demand for ASI Aluminium, the Entity has not actually procured any ASI Aluminium.
<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	<p>The Entity has developed a Supplier Code of Conduct, which addresses the requirements of the ASI Performance Standard, including anti-Corruption. The Supplier Code of Conduct is available at:</p> <p><a href="http://www.chinasnto.com/bocupload/file/%E8%B4%9F%E8%B4%A3%E4%BB%BB%E9%87%87%E8%B4%AD%E6%96%B9%E9%92%88%E5%8F%8A%E4%BE%9B%E5%BA%94%E9%93%BE%E5%B0%BD%E8%81%8C%E8%B0%83%E6%9F%A5.pdf">http://www.chinasnto.com/bocupload/file/%E8%B4%9F%E8%B4%A3%E4%BB%BB%E9%87%87%E8%B4%AD%E6%96%B9%E9%92%88%E5%8F%8A%E4%BE%9B%E5%BA%94%E9%93%BE%E5%B0%BD%E8%81%8C%E8%B0%83%E6%9F%A5.pdf</a></p> <p>The Entity's Procurement Department has communicated the relevant requirements of this Code to Non-CoC Material suppliers and Eligible Scrap suppliers.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has developed a Supplier Code of Conduct, which addresses the requirements of the ASI Performance Standard, including responsible sourcing. The Supplier Code of Conduct is available on the Entity's website. The Entity's Procurement Department has communicated the relevant requirements of this Code to Non-CoC Material suppliers and Eligible Scrap suppliers.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has developed a Supplier Code of Conduct, which addresses the requirements of the ASI Performance Standard, including Human Rights Due Diligence. The Supplier Code of Conduct is available on the Entity's website. The Entity's Procurement Department has communicated the relevant requirements of this Code to Non-CoC Material suppliers and Eligible Scrap suppliers.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has developed a Supplier Code of Conduct, which addresses the requirements of the ASI Performance Standard, including Conflict-Affected and High-Risk Areas. The Supplier Code of Conduct is available on the Entity's website. The Entity's Procurement Department has communicated the relevant requirements of this Code to Non-CoC Material suppliers and Eligible Scrap suppliers.
7.2 Risk Assessment and Mitigation	Minor Non-Conformance	<p>The Entity has communicated a Responsible Sourcing Policy that aligns with the ASI Performance Standard. The procurement staff and others involved have been trained to conduct supplier social responsibility audits. The Entity has identified key suppliers of both CoC Material and Non-CoC Material and has conducted social responsibility audits on these main suppliers. The Entity has requested suppliers to rectify any non-compliance issues discovered during the Due Diligence process to mitigate social responsibility risks within the supply chain.</p> <p>However, the Entity has not conducted on-site audits for some Non-CoC Material suppliers, rather the audits were performed based on</p>

CRITERION	RATING	COMMENT
		the suppliers' responses only and the effectiveness of the audits is insufficient.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a mechanism to address complaints and concerns. Further information is available at: <a href="http://www.chinasnto.com/en/index.php">http://www.chinasnto.com/en/index.php</a>
<b>8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM</b>		
8.1 Material Accounting System	Conformance	The Entity's production activities, including the Input and Output of all materials and products, are managed within a digital Manufacturing Execution System (MES) platform. Based on the MES system, the Entity has established an Excel-based ASI Aluminium Material Balance Sheet, ensuring the integrity of the mass balance of CoC Materials and Eligible Scrap within the scope of certification.
8.2 Material Accounting Period	Conformance	The Material Accounting Period has been defined in the CoC Management Manual as a calendar year: from January 1 to December 31.
8.3 Input and Inflow Quantities	Conformance	The Entity's production activities, including the Input and Output of all materials and products, are managed within a digital Manufacturing Execution System (MES) platform. Based on the MES system, the Entity has established an Excel-based ASI Aluminium Balance Sheet, a detailed record of the monthly Quantities of CoC Materials and Eligible Scrap Input, as well as the Quantities of Non-CoC Materials and Recyclable Scrap Material flowing into the Entity, has been maintained.
8.4 Output Quantities of CoC Material	Conformance	The Entity's production activities, including the Input and Output of all materials and products, are managed within a digital Manufacturing Execution System (MES) platform. Based on the MES system, the Entity has established an Excel-based ASI Aluminium Balance Sheet and a detailed record of the monthly Quantities of CoC Materials and Eligible Scrap Output from the Entity has been maintained. The Balance Sheet indicates the proportion of CoC Material to Non-CoC Material remains consistent at both the Inflow and Outflow.
8.5 Indivisibility of CoC Material	Conformance	The Entity has established a CoC Management Manual that defines that the Output Quantity of CoC Material, which may be a subset of total production, shall be designated as 100% CoC Material. The MES data and CoC Material inventory sheet demonstrates that the Entity understands and conforms with the requirement.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity has established a CoC Management Manual that defines that the Entity would designate the relevant proportion of scrap generated in the production processes as Eligible Scrap using the same percentage share as for its Output of ASI Aluminium. The MES data and CoC Material inventory sheet demonstrates that the Entity understands and conforms with the requirement.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has established a CoC Management Manual that defines that the total Output of CoC Material does not proportionally exceed the Input Percentage of CoC Material over the Material Accounting Period. The MES data and CoC Material inventory sheet demonstrates that the Entity understands and conforms with the requirement.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established a CoC Management Manual that defines that the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period in the case that an Internal Overdraw is made. There has been no occurrence of CoC Material overdraw.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has established a CoC Management Manual that defines 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. There has been no occurrence of CoC Material overdraw.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	In Chapter 8 of Chain of Custody Management Manual, it is defined that the Internal Overdraw shall be made up within the subsequent Material Accounting Period. There has been no occurrence of CoC Material overdraw.
8.9a Positive Balance (Carry over)	Conformance	The Entity has established a CoC Management Manual that defines that the carry over of a Positive Balance shall be clearly identified in the Entity's Material Accounting System. The MES data and CoC Material inventory sheet demonstrates that the Entity understands and conforms with the requirement.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established a CoC Management Manual that defines 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. The MES data and CoC Material inventory sheet demonstrates that the Entity understands and conforms with the requirement. The unadjusted Positive Balance from 2022 that was not utilised in 2023 was not included in the Positive Balance for 2023 and was not carried over to 2024.
<b>9. ISSUING COC DOCUMENT</b>		
9.1 CoC Document	Conformance	The Entity has adopted the CoC Document template as defined in ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity has adopted the CoC Document template as defined in ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, which includes the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity has adopted the CoC Document template as defined in ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, which includes a reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity has adopted the CoC Document template as defined in ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders,

CRITERION	RATING	COMMENT
		which includes the issuing Entity, company address and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity issues a CoC Document for each lot of CoC Material/Product The CoC Document includes details of the receiving customer and their CoC Certification number if it is a CoC Certified Entity.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has established a CoC Management Manual that defines that the sales representative is responsible for verifying the information in the CoC Document and signing them. Sampled CoC Documents demonstrated that the Entity understands and conforms with the requirement.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has established a CoC Management Manual that defines that if the customer requires the Entity to issue the CoC Document in its format then the Entity shall follow the requirement. If not, the Entity shall issue CoC Documents using the template defined in ASI Chain of Custody Standard. Both forms shall include the required conformance statement: Sampled CoC Documents demonstrated that the Entity understands and conforms with the requirement.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity issues CoC Documents as per the template in ASI Chain of Custody Standard, which includes the type of CoC Material. Sampled CoC Documents demonstrated that the Entity understands and conforms with the requirement.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity issues CoC Documents as per the template in ASI Chain of Custody Standard, which includes the mass of CoC Material in the shipment. Sampled CoC Documents demonstrated that the Entity understands and conforms with the requirement.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity issues CoC Documents as per the template in ASI Chain of Custody Standard, which includes the mass of total material. Sampled CoC Documents demonstrated that the Entity understands and conforms with the requirement.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will not provide Sustainability Data by default. However, upon customer request, the Marketing and Sales Department will share the Life Cycle Assessment Report with the customer. Sampled CoC Documents demonstrated that Sustainability Data such as the carbon footprint is not included at present.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will not provide Sustainability Data by default. However, upon customer request, the Entity will share the origin information with the customer. Sampled CoC Documents demonstrated that Sustainability Data such as the origin information is not included at present.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will not provide Sustainability Data by default. However, upon customer request, the Entity will share the information with therecycled content information with the customer. Sampled CoC

CRITERION	RATING	COMMENT
		Documents demonstrated that Sustainability Data such as the recycled content is not included at present.
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will not provide Sustainability Data by default. However, upon customer request, the Entity will share the information with the customer, including its ASI Certification Status. Sampled CoC Document demonstrated that Sustainability Data such as information on the Entity's ASI Certification Status is not included at present.
9.4 Supplementary Information (optional) – Objective evidence	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will not provide Supplementary Information by default. However, upon customer request, the Entity will share the information with the customer and provide appropriate Objective Evidence. Sampled CoC Documents demonstrated that apart from the requirements stipulated, customers have not made any additional requests for Supplementary Information.
9.5 Verification of Information	Conformance	The Entity has defined the responsibility and the process to respond to requests for verification of information in CoC Document issued by the Entity. Sampled CoC Documents demonstrated that the means of verifying information, such as a contact person's name, phone number, and email, have been specified in the CoC Document and provided to the recipients of the CoC Document.
9.6 Error (Shipping)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has a process to record errors, analyse the root cause, and implement corrective action to prevent a reoccurrence. In 2023, the Entity developed corrective measures and improvement plans in response to the errors identified in the CoC Document raised by the customer. The Entity is currently awaiting the customer's approval, and it is committed to promptly implementing the approved corrective action plan once the customer provides their endorsement.
<b>10. RECEIVING COC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will implement a process to verify all required information in received CoC Documents as required by ASI Chain of Custody Standard.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will implement process to verify all required information in received CoC Documents as required by ASI Chain of Custody Standard.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established a CoC Management Manual that defines that the Entity will implement process to verify the supplier's ASI CoC Certification Status at: <a href="https://aluminiumstewardship.org/about-asi/asimember-listing">https://aluminiumstewardship.org/about-asi/asimember-listing</a>
10.4 Error (Reception)	Conformance	The Entity has established a process to record errors, provide feedback to the supplier and require them to take the associated corrective action to prevent a reoccurrence. At the time of the audit,

CRITERION	RATING	COMMENT
		there was one identified error and the relevant records of corrective actions have been retained.
<b>11. CLAIMS AND COMMUNICATIONS</b>		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has defined within its CoC Management Manual that all claims and communications shall follow the ASI Claims Guide including communication with the ASI Secretariat. The Entity's Management Representative is responsible for this issue.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has assigned roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide and there shall be the verifiable evidence to support the claims and/or representations made.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has provided training to relevant employees on claims and communications.

#### 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	14 March 2024	Re-Certification Audit and Scope Change – expired Certificate – Full Certification. The Entity was previously CoC Certified between 19 November 2019 to 13 November 2022 under Certificate 54, however at the end of the Certification Period the Certification expired. Scope Change to apply ASI PS V3.