ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Zouping Xinsanyuan Aluminium Co., Ltd. & Shandong Longkou Sanyuan Aluminium Co., Ltd.

CERTIFICATE NUMBER

417

ASI STANDARD

CHAIN OF CUSTODY STANDARD (V2 2022)

21 NOVEMBER 2024

CERTIFICATION LEVE

FULL CERTIFICATION

20 NOVEMBER 2027

ASI ACCREDITED AUDITING FIRM

SGS-CSTC STANDARDS TECHNICAL SERVICES

DATE OF ISSUE

DATE OF EXPIRY

CERTIFIED SINCE

21 NOVEMBER 2024

AUTHORISED BY

The

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

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).

SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Sanyuan Aluminium Co., Ltd.		
ENTITY NAME	Zouping Xinsanyuan Aluminium Co., Ltd. & Shandong Longkou Sanyuan Aluminium Co., Ltd.		
CERTIFICATION SCOPE	Processing of Aluminium coil at Zouping Xinsanyuan Aluminium Co., Ltd. (China); Processing of Aluminium coil and sheet at Shandong Longkou Sanyuan Aluminium Co., Ltd. (China).		
SUPPLY CHAIN ACTIVITIES	Post-Casthouse		
ASI STANDARD	Chain of Custody Standard V2		
AUDIT TYPE	Initial Certification Audit		
AUDIT FIRM	SGS-CSTC Standards Technical Services		
AUDIT DATE	• 22 - 24 October 2024		
AUDIT REPORT SUBMISSION	8 November 2024		
AUDIT SCOPE	The Audit Scope includes Zouping Xinsanyuan Aluminium Co., Ltd.in Binzhou, Shandong Province, China and Shandong Longkou Sanyuan Aluminium Co., Ltd. in Yantai, Shandong Province, China.		
	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.		
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	21 November 2024 – 20 November 2027
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	21 November 2026
CERTIFICATE NUMBER	417



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

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

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

ENTITY OVERVIEW

Sanyuan Aluminium Co., Ltd. was established in 2007 in Zhuhai, China and currently has two plants in Shandong province: Shandong Longkou Sanyuan Aluminium Co., Ltd and Zouping New Sanyuan Aluminium Co., Ltd (collectively 'The Entity'). The Entity mainly produces and supplies Aluminium tab stock and end stock for the fabrication of easy open ends of beverage and food metal cans. The Entity's capacity currently includes four existing coiled material production lines, two longitudinal shear production lines, two wave shear production lines, three coating production lines, and three printing production lines. The Entity's annual production capacity is approximately 100,000 tonnes.

The Entity's main international customers include the Crown group and Ball Group and are located predominantly in Southeast Asia, the Middle East and South America. The Entity's main domestic customers include ORG Group, Bright Group, Baosteel Group, and Want Want Group, and are located throughout China. Sanyuan company's products are used in well-known brands including Coca Cola, Pepsi, Redbull, Want Want Milk, and Tsingtao Beer. The Entity is currently supplying to more than 20 countries and approximately 50 customers. The Entity and its products are well known both in China and international markets.

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.

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

Medium
Low
Medium
MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM ANI	D RESPONSIBILITIES	
1.1 ASI Membership	Conformance	Sanyuan Aluminium Co., Ltd, which has direct control of the Entity, joined ASI as a Member in August 2021 in the Production and Transformation class. The membership information is available at https://aluminium-CoLtd-
1.2 CoC Management System	Conformance	The Entity has a well-established integrated Management System. The Facility is certified against ISO 9001, ISO 14001, ISO 45001 and ISO22000. ASI CoC requirements are addressed by the Entity's existing Management Systems and additional procedures.
1.3 CoC Management System Monitoring	Conformance	The Entity conducts annual management reviews of its integrated Management Systems. The ASI requirements are included in the annual management review. An internal audit has been conducted against compliance with the PS & CoC Standards.
1.4 Management Representative	Conformance	The Vice General Manager was appointed as the Management Representative (MR) of the integrated Management Systems in April 2022 by the Entity's General Manager. The role of MR has been specified. The appointment letter was communicated amongst the department.
1.5 Communications and Training	Conformance	The Entity has a training management procedure that defines the planning and implementation of ASI related training. All Entity management personnel are trained on Chain of Custody
		(CoC) requirements and training records are maintained. All participants are tested and test records maintained, and relevant workers are trained on the ASI requirements through process instructions.
1.6 Records Management	Conformance	The Entity has implemented documented information management procedures. The procedures define the retention time of documents, with a retention time of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The Entity's report form includes all required information, and the annual report on the use of ASI Aluminium has been designed to report to ASI.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The Entity's report form includes all required information, and the annual report on the use of ASI Aluminium has been designed to report to ASI.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The Entity's report form includes all required information, and the annual report on the use of ASI Aluminium has been designed to report to ASI.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The Entity's report form includes all required information, and the annual report on the use of ASI Aluminium has been designed to report to ASI.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The annual report on the use of ASI Aluminium, including any Positive Balance used, has been designed to report to ASI.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has defined the requirements for reporting in its ASI reporting procedure and will report all required information, including any Internal overdraw drawn down from the subsequent Material Accounting Period.
1.7g Reporting to ASI (Intra- Entity Flows)	Conformance	The Entity has an established CoC material management procedure to define how to report information as required under the ASI CoC Standard.
		The report form includes all required information. There is currently no CoC Materials transferred between supply chain activities within the Entity (Intra-Entity Flows).
2. OUTSOURCING CONTRAC	TORS	
2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.

CRITERION	RATING	COMMENT
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as it does not undertake any outsourcing activities.
3. PRIMARY ALUMINIUM: CRI	TERIA FOR ASI BAUX	TITE, ASI ALUMINA AND ASI ALUMINIUM
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4. RECYCLED ALUMINIUM: CI	RITERIA FOR ELIGIBLI	E 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.

CRITERION	RATING	COMMENT
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 FO	OR ASI ALUMINIUM	
5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6. POST-CASTHOUSE: CRITER	RIA FOR ASI ALUMIN	IIUM
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established procedures to ensure that it produces Aluminium Products only from Facilities that are within the CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Facility has been certified against the ASI Performance Standard since May 2023: https://aluminium-stewardship.org/about-asi/members/Sanyuan-Aluminium-CoLtd-
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has implemented a system to ensure that all ASI Aluminium is purchased from suppliers which are ASI CoC certified.
7. DUE DILIGENCE FOR NON- MATERIAL	COC MATERIAL, CC	OC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy addressing anti-Corruption on its website at: http://www.sy-aluminium.com/download/2356.html The Responsible Sourcing Policy has been sent to the Entity's suppliers and acknowledged by the Entity's suppliers.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy and committed Responsible Sourcing on its official website at: http://www.sy-aluminium.com/download/2356.html

CRITERION	RATING	COMMENT
		The Responsible Sourcing Policy has been sent to the Entity's suppliers for acknowledgement.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy, which includes Human Rights Due Diligence, on its official website: http://www.sy-aluminium.com/download/2356.html
		The Responsible Sourcing Policy has been sent to all Entity's suppliers.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy covering Conflict-Affected and High-Risk Areas (CAHRA) on its official website at: http://www.sy-aluminium.com/download/2356.html
		The Responsible Sourcing Policy has been sent to all Entity's suppliers.
7.2 Risk Assessment and Mitigation	Minor Non- Conformance	The Entity has ensured a Supplier Self-Assessment Survey has been completed by all suppliers. The Supplier Self-Assessment Survey covers Human Rights due diligence, quality management and Environmental Health and Safety. However, no evidence was provided that confirmed the Entity has assessed the risk of the supplier non-compliance based on the data collected by the survey.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has implemented a communication management procedure that allows interested parties to voice concerns on non-compliance with its Responsible Sourcing Policy in its Aluminium supply chain. The Entity has no current concerns identified regarding non-compliance with its responsible sourcing Policy in the Aluminium supply chain.
8. MATERIAL ACCOUNTING S	SYSTEM: COC MATE	RIAL AND ASI ALUMINIUM
8.1 Material Accounting System	Conformance	The Entity has adopted an Enterprise Resource Planning (ERP) system for identifying and marking of CoC Material, which allows it to identify all Input and Output CoC Material along the material flow.
8.2 Material Accounting Period	Conformance	The Entity's CoC material management procedure specifies that the Entity's accounting period is fixed as one year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a procedure which defines that in each Material Accounting Period, the quantities of CoC Material, Eligible Scrap Input, Non-CoC Material and Recyclable Scrap Material Inflow to the Certification Scope are to be recorded.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established an ERP system for identifying and marking of CoC Material. It is possible to identify all Input and Output Material along the CoC Material flow. The outflows of CoC Material are calculated based on the sales volume as per the ERP system.
8.5 Indivisibility of CoC Material	Conformance	The Entity only produces CoC coil when required by customer orders. The Entity can classify its relevant Output Quantity as 100% CoC Material.

CRITERION	RATING	COMMENT
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity, as the Entity does not seek to designate material as Eligible Scrap. Process Scrap is pressed and sold to an authorised Scrap dealer.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity only produces CoC Material for the orders of its ASI Entity clients and collects Scrap from ASI production accordingly. The Entity has procedures to ensure there is no risk that the Output of CoC Material and/or Eligible Scrap exceeds the Input of CoC Material.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has defined in its ASI procedure that in the case of a Force Majeure situation, the Material Accounting System can carry over an Internal Overdraw of up to 20% of the total Input Quantity of CoC Material to the subsequent accounting period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has defined in its ASI procedure that in the case of a Force Majeure situation, the Material Accounting System can carry over an Internal Overdraw to the subsequent accounting period. The amount of Overdraw must not exceed the amount of CoC Material that was part of the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has defined in its ASI procedure that in the case of a Force Majeure situation, the Material Accounting System can carry over an Internal Overdraw to the subsequent accounting period, but the amount of CoC Material must be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has defined in its ASI procedure that CoC Material that cannot be used within a current year may be transferred to the next accounting period. The Entity's Material Accounting System will clearly identify any carry over of a Positive Balance.
8.9b Positive Balance (Expiry)	Conformance	The Entity has defined in its ASI procedure that CoC Material that cannot be used in the current year may be transferred to the next accounting period. The procedure requires that the relevant material be marked as carry over CoC Material and must be consumed within this period.
9. ISSUING COC DOCUMENT	S	
9.1 CoC Document	Conformance	The Entity's CoC material management procedure specifies that the CoC document shall accompany each shipment of CoC Material dispatched to other CoC Certificated Entities. The procedure defines the requirements of the CoC Document.
9.2a CoC Document Content (Date of issue)	Conformance	The CoC material management procedure defines that the CoC document will carry the date of issue, which is the date of the delivery note.
9.2b CoC Document Content (Reference number)	Conformance	All relevant documents issued by the Entity, including CoC Documents, have a reference number. The reference number is linked to the Entity's material accounting system for crossverification purposes.

CRITERION	RATING	COMMENT
9.2c CoC Document Content (Issuing Entity)	Conformance	The CoC material management procedure defines the CoC Document should include the identity, address and CoC Certification number of the Entity. The procedure defines that this information shall be included for each shipment.
9.2d CoC Document Content (Receiving customer)	Conformance	The CoC material management procedure defines the CoC Document should include the identity, address and the CoC Certification number of the customer receiving the Entity's CoC Material (if the customer is another ASI CoC Certified Entity).
9.2e CoC Document Content (Responsible employee)	Conformance	All documents issued by the Entity to their clients, including CoC Documents, include the name of the person who is responsible for the inspection of the materials/products (QC Manager).
9.2f CoC Document Content (Conformance statement)	Conformance	The CoC material management procedure defines the CoC Document will carry the claim "The information provided in the CoC document is in accordance with the ASI CoC standard".
9.2g CoC Document Content (Type of CoC Material)	Conformance	The CoC material management procedure defines the CoC Document will specify the type of CoC Material as 'Aluminium coil'.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	All shipping documents issued by the Entity, including CoC Documents, provide information on the amount of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	All shipping documents issued by the Entity, including CoC Documents, provide information on the mass of CoC Material and the mass of total Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity, as the Entity has decided not to disclose carbon footprint Sustainability Data on their CoC Documents.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	The Entity will not make Sustainability Data available in the CoC Document initially, but only upon request and agreement with the receiving Entity.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	The Entity will not make Sustainability Data available in the CoC Document initially, but only upon request and agreement with the receiving Entity.
9.3d Sustainability Data (optional) - Post- Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable to the Entity, as it has decided not to provide Supplementary Information in CoC Documents.
9.5 Verification of Information	Conformance	The Entity has a system in place to define a response mechanism to reasonable requests from external interested parties. The Entity's

CRITERION	RATING	COMMENT
		Sales Manager is responsible for responding to questions on the information in the CoC Documents issued by the Entity.
9.6 Error (Shipping)	Conformance	The Entity has a procedure in place that defines the process for any discovered error after CoC Material shipment. Any errors found by the Entity should be promptly reported to the receiving Entity and agreed steps by both parties should be taken to correct it and implement actions to avoid a recurrence.
10. RECEIVING COC DOCUMI	ENTS	
10.1 Verification of CoC Documents	Conformance	The Entity has a procedure in place that stipulates all required information in received CoC Documents should be verified by the Entity's supply chain department.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has a procedure in place that stipulates the supply chain department should verify the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has a procedure in place that stipulates the supply chain department shall check the ASI website for every CoC material received from supplier 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 (Reception)	Conformance	The Entity has a procedure is in place to define the process for a discovered error after CoC Material is received. The Entity and the supplying party shall document the error and the agreed steps to be taken to correct it and implement actions to avoid a recurrence.
11. CLAIMS AND COMMUNICA	ATIONS	
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity's integrated Management System manual defines that claims and communications shall be made in a manner consistent with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has established an integrated System Management manual for claims referring to the ASI Claims Guide. The manual requires the verifiable evidence to support the claims and/or representations shall be disclosed at the request of customers.
11.1c Claims and Communications (Employee training)	Conformance	The Entity's training management framework has defined the requirements of CoC training. The Entity has provided training for relevant employees regarding the ASI Claims Guide requirements.

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	November 21 2024	Initial Certification Audit – Full Certification