

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Novelis Aluminum (Zhenjiang) Co., Ltd

CERTIFICATE NUMBER

281

ASI STANDARD

CHAIN OF CUSTODY  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED AUDITING  
FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

17 APRIL 2023

DATE OF EXPIRY

1 MARCH 2027

CERTIFIED SINCE

17 APRIL 2023

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

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

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

## CERTIFICATION SCOPE

All activities at the Zhenjiang (China) site to produce Aluminium products including:

- Cast Houses
- Scalper
- 160" Hot Rolling Mill
- Horizontal Heat-treatment furnace
- Stretcher up to 6,000T
- Plate sawing centers
- Ultrasonic testing
- Machining Center
- R&D Center & Testing Laboratory

Outsourcing Contractors:

Changzhou Changling Heavy CNC Machine Tool Co., Ltd, No. 10, Fukang Road, Xinbei District, Changzhou, Aluminum Plate tolling service.

Wuxi Heng Tai Aerospace Science and Technology Co., Ltd, No. 8, Liulv Road, Hudi Town, Binhu District, Wuxi City, Aluminum Plate tolling service.

# AUDIT REPORT

## CHAIN OF CUSTODY

### STANDARD

#### OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Aluminum (Zhenjiang) Co., Ltd
CERTIFICATION SCOPE	<p>All activities at the Zhenjiang (China) site to produce Aluminium products including:</p> <ul style="list-style-type: none"><li>– Cast Houses</li><li>– Scalper</li><li>– 160" Hot Rolling Mill</li><li>– Horizontal Heat-treatment furnace</li><li>– Stretcher up to 6,000T</li><li>– Plate sawing centers</li><li>– Ultrasonic testing</li><li>– Machining Center</li><li>– R&amp;D Center &amp; Testing Laboratory</li></ul> <p>Outsourcing Contractors:</p> <ul style="list-style-type: none"><li>– Changzhou Changling Heavy CNC Machine Tool Co., Ltd, No. 10, Fukang Road, Xinbei District, Changzhou, Aluminum Plate tolling service.</li><li>– Wuxi Heng Tai Aerospace Science and Technology Co., Ltd, No. 8, Liulv Road, Hudi Town, Binhu District, Wuxi City, Aluminum Plate tolling service.</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>● Casthouses</li><li>● Post-Casthouse</li></ul>
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none"><li>● Initial Certification Audit (21 – 22 February 2023)</li><li>● Surveillance Audit (14 – 15 January 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>● 21 – 22 February 2023 (Initial Certification Audit)</li><li>● 14 – 15 January 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>● 3 April 2023 (Initial Certification Audit)</li><li>● 25 January 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 22 February 2023)</u></p> <p>The Audit Scope covers all processes at the Zhenjiang production facility and related tollers including Changzhou Changling Heavy CNC Machine Tool Co., Ltd and Wuxi Heng Tai Aerospace Science and Technology Co., Ltd.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>● Casthouses</li><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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Surveillance Audit (14 – 15 January 2025)

The Audit Scope covers all processes at the Zhenjiang production facility and related tollers including Changzhou Changling Heavy CNC Machine Tool Co., Ltd and Wuxi Heng Tai Aerospace Science and Technology Co., Ltd.

The supply chain activities included in the Audit Scope:

- Casthouses
- 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
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><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	17 April 2023 – 1 March 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	1 March 2027
CERTIFICATE NUMBER	281

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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

Novelis Aluminum (Zhenjiang) Co., Ltd. (the 'Entity') was founded in March 2011 and commenced operation in April 2013. It is Asia's first plant dedicated to high-end aerospace products and industrial Aluminium rolled plates, and the main products include pre-stretched plates, wing skin plates for aerospace, and high-end commercial plates. The area under management is approximately 27 hectares, which is located at No. 111 Caijia Road, Jingkou Industrial Zone, Zhenjiang, Jiangsu, China.

The Zhenjiang plant has 565 employees on site with an additional 14 contractors employed on a full-time basis. The Facility is designed and equipped with research, development, and manufacturing capabilities to meet regional and global demand for technically advanced Aluminium products for aerospace and commercial plate applications.

The nearest scenic zones are the Jiao Shan scenic zone and a Buddhist temple, approximately 11 kilometres (km) and four km from the Jingkou Industrial Zone respectively. Key external stakeholders include the Government of China, the International Finance Corporation (IFC), the local city of Jiangsu Province, relevant suppliers, corporate customers, and local community residents.

The Entity's annual output capacity is more than 38,000 tonnes. In April 2023, the Entity received the 'Special Contribution to the Zhenjiang Civil Aerospace Industry' award from the Zhenjiang Municipal People's Government.

## 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	Novelis Inc. joined ASI in January 2015 in the Production and Transformation class. As per the ASI Performance Standard Management Manual, the Entity commits to complying with ASI's membership obligations and the ASI Complaints Mechanism. The membership is shown at: <a href="https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc">https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc</a>
1.2 CoC Management System	Conformance	The Entity has a documented ASI Chain of Custody (CoC) Management System based on the requirements of the ASI Chain of Custody Standard. At the time of the Audit, no CoC Material, including ASI Aluminium had been received or delivered to the site. During the Audit, the Entity performed a simulation to demonstrate the effectiveness of the Management System.
1.3 CoC Management System Monitoring	Conformance	The Entity has established the process to periodically review the ASI CoC Management System to ensure its continual adequacy, adaptability, and effectiveness. The latest management review was conducted in December 2024.
1.4 Management Representative	Conformance	The Entity has appointed a member of senior management as the Management Representative who is the responsible person for the ASI Chain of Custody Standard implementation and has defined the roles and responsibilities to manage the Entity's CoC system.
1.5 Communications and Training	Conformance	The Entity has identified key employees and provided these employees with training on the ASI Chain of Custody Standard to make them aware of, and competent in their responsibilities under the ASI CoC Management System. Training materials and records are maintained.
1.6 Records Management	Conformance	The document and record management for the ASI CoC Management System follows the process in the Entity's integrated Management System. The retention time is defined as a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Materials to the ASI Secretariat. The Entity reports the relevant information to the ASI Secretariat within the defined period. To date, no CoC Material is available in the Entity's supply chain.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Materials to the ASI Secretariat. The Entity reports the relevant information to the ASI Secretariat within the defined period. To date, no CoC Material is available in the Entity's supply chain.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Material to the ASI Secretariat. The Entity reports the relevant

CRITERION	RATING	COMMENT
		information to the ASI Secretariat within the defined period. To date, no CoC Material is available in the Entity's supply chain.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Material to the ASI Secretariat. To date, no CoC Material is available in the Entity's supply chain.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Material to the ASI Secretariat. To date, no CoC Material is available in the Entity's supply chain.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Material to the ASI Secretariat. To date, no CoC Material is available in the Entity's supply chain.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has established an ASI Chain of Custody Standard Management Manual, which defines how to report the information on CoC Material to the ASI Secretariat. To date, no CoC Material is available in the Entity's supply chain.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Conformance	The Entity has identified two subcontractors from the approved suppliers' list who take Custody of the Entity's CoC Material and are not certified against the ASI Standards. These two Outsourcing Contractors are identified in the Entity's CoC Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Conformance	It is clearly defined in the Entity's ASI Chain of Custody Standard Management Manual and the purchasing agreements signed between the Entity and the two subcontractors, that the Entity owns the CoC Material used by subcontractors.
2.2b Control of CoC Material (No further outsourcing)	Conformance	It is defined in the ASI Chain of Custody Standard Management Manual that Outsourcing Contractors shall not outsource any processing, treatment or manufacturing of CoC Material to any other contractor. In the purchasing agreements signed between the Entity and the two subcontractors, no further outsourcing is allowed.
2.2c Control of CoC Material (Risk assessment)	Conformance	The Entity has identified, assessed, and controlled the risk of potential Non-Conformance with the ASI Chain of Custody Standard resulting from the engagement of the Outsourcing Contractors included within the CoC Certification Scope. The latest supplier audit reports of the two subcontractors demonstrate that associated risks are low.
2.3 Information on Quantity of CoC Material Output and Returned	Conformance	AS per the Entity's ASI Chain of Custody Standard Management Manual, the information on the Output Quantity of CoC Material and the Quantity of CoC Material returned to the Entity shall be recorded in the Material Accounting System. A simulation of the Entity's Material Accounting System undertaken during the Audit demonstrated that the procedure can be implemented correctly and all information on

CRITERION	RATING	COMMENT
		CoC Material quantity is correctly registered. The relevant personnel are aware of these requirements.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Conformance	The Entity's Supply Chain Management Department is responsible for ensuring the consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractors. A simulation of the Entity's Material Accounting System undertaken during the Audit demonstrated that the quantity data of CoC Material in Inflow and Outflow to/from subcontractors is verified by responsible personnel and is balanced and consistent.
2.5 Error (Outsourcing Contractor)	Conformance	Following the Corrective and Preventive Actions Procedure in the Entity's Quality, Environment and Occupational Health and Safety Management System, once an error is found, the error shall be documented and corrected following confirmation by warehouse management staff. Subcontractors are required to take necessary corrective action to avoid a recurrence. At the time of the Audit, there were no examples of effective implementation of the system as no CoC Material was available in the Entity's supply chain.

### 3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM

3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

### 4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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CRITERION	RATING	COMMENT
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### 5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established a process to ensure that all claimed ASI Aluminium is produced from the Casthouse within the Entity's Certification Scope. The persons who are responsible for delivering ASI Aluminium receive training to understand the requirements. A simulation of the Entity's Management System undertaken during the Audit demonstrated that the requirements are followed.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity is certified against the ASI Performance Standard (Certificate Number 220).
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	As per the ASI Chain of Custody Management Manual, the Procurement Department is responsible for verifying the ASI Certification status of suppliers of ASI Aluminium or, where ASI Aluminium is supplied via a Trader, ensuring that the ASI CoC Certified Entity is identified and has provided a verified CoC Document.
5.2 Unique Identification	Conformance	In accordance with traceability requirement in the Quality Management System, the Entity allocates a unique identification number to the Aluminium Product, which is stamped on the product, and the number recorded in the Material Accounting System which links and corresponds to the Input Quantity of CoC Material.

#### 6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established a process to ensure that all claimed ASI Aluminium is produced from the Facilities within the Entity's Certification Scope. The persons responsible for delivering ASI Aluminium receive training and understand the requirements. A simulation of the Entity's Management System undertaken during the Audit demonstrated that this requirement is followed.
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CRITERION	RATING	COMMENT
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity is certified against the ASI Performance Standard (Certificate Number 220).
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has a system in place to ensure that it produces ASI Aluminium only from Entities certified against the ASI Chain of Custody Standard. The Procurement Department is responsible for checking the ASI status of suppliers and sharing the information with other departments to ensure compliance. The persons who are responsible for delivering ASI Aluminium receive training and understand these requirements. A simulation of the Entity's Management System undertaken during the Audit demonstrated that this requirement is followed.
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity communicates with all suppliers the Supplier Code of Conduct (equivalent to the Responsible Sourcing Policy), which addresses the requirements of anti-Corruption. The suppliers sign and return the Supplier Code of Conduct to demonstrate their commitment to follow these requirements. The Supplier Code of Conduct is available at: <a href="https://www.novelis.com/wp-content/uploads/2024/08/CHS_Novelis-Supplier-Code-of-Conduct-08232024.pdf">https://www.novelis.com/wp-content/uploads/2024/08/CHS_Novelis-Supplier-Code-of-Conduct-08232024.pdf</a>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity communicates with all suppliers the Supplier Code of Conduct in which the requirement of responsible sourcing is included. The suppliers sign the Supplier Code of Conduct to demonstrate their commitment to following the requirement.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity communicates with all suppliers the Supplier Code of Conduct in which the requirement of Human Rights Due Diligence is included. The suppliers sign the Supplier Code of Conduct to demonstrate their commitment to following the requirement.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity communicates with all suppliers the Supplier Code of Conduct in which the requirement of Conflict-Affected and High-Risk Areas is included. The suppliers sign the Supplier Code of Conduct to demonstrate their commitment to following the requirement.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has assessed the risks in its supply chain, identified the Tier 1 major suppliers, and conducted audits against the ASI Performance Standard. Suppliers are required to take actions to mitigate the corresponding adverse impact and prevent the recurrence of non-conformances raised in audits.
7.3 Complaints Resolution Mechanism	Conformance	The Novelis Group has established a global mechanism to address complaints and concerns related to ASI. The channel is available at: <a href="https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf">https://zh-hans.novelis.com/wp-content/uploads/2022/01/03_Whistleblower-Policy-CHS-rev-Oct2021.pdf</a>  During the Audit, the hotline was tested to verify the effectiveness of the mechanism.

CRITERION	RATING	COMMENT
<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 records the Input and Output Quantity of CoC Material/ Eligible Scrap and Non-CoC Material/Scrap by mass. At the time of the Audit, there was no ASI Material available in the Entity's supply chain, and the simulation of the Entity's Material Accounting System conformed to the requirements.
8.2 Material Accounting Period	Conformance	The Entity has defined in its ASI Chain of Custody Management Manual a Material Accounting Period as the calendar year from January 1 to December 31.
8.3 Input and Inflow Quantities	Conformance	The Entity records the Quantities of each CoC Material and Eligible Scrap Input and the Quantities of Non-CoC Material and Recyclable Scrap Material Inflow and determine the Inflow Quantity of Eligible Scrap and Recyclable Scrap Material based on an assessment of Aluminium content. At the time of the Audit, there was no ASI Material available in the Entity's supply chain.
8.4 Output Quantities of CoC Material	Conformance	The Entity's Material Accounting System demonstrates the available Quantities of CoC Material for Output will be determined by the Input Quantities for each CoC Material proportional to the total Inflows of CoC and Non-CoC Material by mass.
8.5 Indivisibility of CoC Material	Conformance	The Entity has defined within its Chain of Custody Management Manual that the Output Quantity of CoC Material shall be designated as 100% CoC Material. A simulation of the Entity's Material Accounting System undertaken during the Audit demonstrated that the Entity understands and follows this requirement.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity has defined within its Chain of Custody Management Manual that the relevant proportion of Scrap generated in the production processes is designated as Eligible Scrap, using the same percentage share as for its Output of ASI Aluminium. A simulation of the Entity's Material Accounting System undertaken during the Audit demonstrated that the Entity understands and follows this requirement.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has defined within its Chain of Custody Management Manual that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period. In the Material Accounting System, a formula is embedded to alert any exceedance.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has defined within its Chain of Custody Management Manual that the Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period in the case that the Internal Overdraw has to be made.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has defined within its Chain of Custody Management Manual that an Internal Overdraw is only permitted when CoC Material has been contracted to be delivered to the Entity, however a Force Majeure situation has prevented timely delivery and the Internal

CRITERION	RATING	COMMENT
		Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has defined within its Chain of Custody Management Manual that the Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has defined within its Chain of Custody Management Manual that the carryover of a Positive Balance shall be identified in the Entity's Material Accounting System. The stimulation of the Entity's Material Accounting System demonstrates that the Entity understands and follows the requirement.
8.9b Positive Balance (Expiry)	Conformance	The Entity has defined within its ASI Chain of Custody Management Manual, that the Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period shall expire at the end of that period if not drawn down.
<b>9. ISSUING COC DOCUMENTS</b>		
9.1 CoC Document	Conformance	The Entity intends to use the CoC Document template defined in the 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 intends to use the CoC Document template defined in the ASI Chain of Custody Standard to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, including the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity will issue a CoC Document to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, including the Reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity will issue a CoC Document to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders, including the issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity will issue a CoC Document for each lot of material/product, the CoC Document shall include the receiving customer and its CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has defined within the Chain of Custody Management Manual that the sales representative is responsible for verifying the information in the CoC Documents and signing them.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has defined within the Chain of Custody Management Manual, that if the customer requires to issue the CoC Document in its format, the Entity shall follow the requirement. If not, the Entity shall issue a CoC Document for each lot of material/product using the CoC Document template defined in the ASI Chain of Custody Standard, both forms shall include a conformance statement.

CRITERION	RATING	COMMENT
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity will issue a CoC Document for each lot of material/product and include the type of CoC Material.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity will issue a CoC document for each lot of material/product and include the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity will issue a CoC document for each lot of material/product and include the mass of total material.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	As per the Chain of Custody Management Manual, the Entity does not provide the Sustainability Data by default. If a customer raises a request, the Customer Service Manager will share the Life Cycle Assessment Report with the customer.
9.3b Sustainability Data (optional) - Origin information	Conformance	As per the Chain of Custody Management Manual, the Entity will not provide the Sustainability Data by default. If the customer raises the request, the Customer Service Manager will share the information with the customer, including the origin of the Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Conformance	As per the Chain of Custody Management Manual, the Entity will not provide the Sustainability Data by default. If the customer raises a request, the Customer Service Manager will share the information with the customer, including the information on recycled content.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity has defined within its Chain of Custody Management Manual that the Entity will not provide the Sustainability Data by default. If a customer raises a request, the Customer Service Manager will share the information with the customer, including ASI Certification Status.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity has defined within its Chain of Custody Management Manual, that the Entity will not provide Supplementary Information by default. If the customer raises a request, the Customer Service Manager will share the information with the customer and provide objective evidence per request.
9.5 Verification of Information	Conformance	The Entity has defined within its Chain of Custody Management Manual the responsibility and the process to respond to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error (Shipping)	Conformance	Integrated with its 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 the reoccurrence.
<b>10. RECEIVING COC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity has defined within its ASI Chain of Custody Management Manual the responsibility and the process for the verification of information included in received CoC Documents.

CRITERION	RATING	COMMENT
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has defined within its ASI Chain of Custody Management Manual the responsibility and the process to verify the consistency of received CoC Documents with the accompanying CoC Material before recording information in their Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has defined within its ASI Chain of Custody Management Manual the responsibility and the process to verify the supplier's CoC Certification Status. The Entity will verify the status at: <a href="https://aluminium-stewardship.org/about-asi/asi-member-listing">https://aluminium-stewardship.org/about-asi/asi-member-listing</a>
10.4 Error (Reception)	Conformance	The Entity has defined within its ASI Chain of Custody Management Manual, that when an error in a CoC Document received is found, the Supply Chain Management Department is responsible to record the error, provide feedback to the supplier, and require the supplier to implement any associated corrective actions to prevent the reoccurrence. The relevant records of corrective actions shall be kept.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has defined within its ASI CoC Management Manual, that all claims and communications shall follow the ASI Claims Guide including communication with the ASI Secretariat. The Management Representative is responsible for claims and communications.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has committed to following the requirements on claims and communication. The Entity has defined within its ASI CoC Management Manual the assigned roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide, and the claims and/or representations made shall be supported by verifiable evidence.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has defined the training process within its ASI Management Manual and has provided training courses on claims and communication to 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	17 April 2023	Initial Certification Audit – Full Certification
1	4 February 2025	Surveillance Audit; Extension to the Certification expiry date (from 16 April 2026), consistent with ASI's voluntary option for CoC Standard Certification extensions