# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Shanghai Sunho Aluminum Foil Co., Ltd

CERTIFICATE

65

**ASI STANDARE** 

CHAIN OF CUSTODY (V2 2022)

DATE OF ISSUE

**10 JANUARY 2023** 

CERTIFICATION

**DATE OF EXPIRY** 

1 MARCH 2027

FULL CERTIFICATION DNV BUSINESS

FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

10 JANUARY 2020

#### **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**

Manufacture of aluminium and aluminium alloy foils at Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China.

# AUDIT REPORT CHAIN OF CUSTODY STANDARD

### **OVERVIEW**

MEMBER NAME	HENAN SUNHO COAL & POWER CO., LTD				
ENTITY NAME	Shanghai Sunho Aluminum Foil Co., Ltd				
CERTIFICATION SCOPE	Manufacture of aluminium and aluminium alloy foils at Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China.				
SUPPLY CHAIN ACTIVITIES	Post-Casthouse				
ASI STANDARD	Chain of Custody Standard V2				
AUDIT TYPE	<ul> <li>Initial Certification Audit (14 – 15 November 2019)</li> <li>Surveillance Audit (9 – 10 September 2021)</li> <li>Re-Certification Audit and Scope Change (1 – 2 December 2022)</li> <li>Surveillance Audit (25 October 2024)</li> </ul>				
AUDIT FIRM	DNV Business Assurance Services UK Ltd.				
AUDIT DATE	<ul> <li>14 - 15 November 2019 (Initial Certification Audit)</li> <li>9 - 10 September 2021 (Surveillance Audit)</li> <li>1 - 2 December 2022 (Re-Certification Audit and Scope Change)</li> <li>25 October 2024 (Surveillance Audit)</li> </ul>				
AUDIT REPORT SUBMISSION	<ul> <li>2 December 2019 (Initial Certification Audit)</li> <li>17 October 2021 (Surveillance Audit)</li> <li>30 December 2022 (Re-Certification Audit and Scope Change)</li> <li>12 December 2024 (Surveillance Audit)</li> </ul>				
AUDIT SCOPE	Initial Certification Audit (14 – 15 November 2019)  Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of Aluminium and Aluminium alloy foils.  The supply chain activities include in the Audit Scope:  Post-Casthouse				
	All relevant criteria in the ASI Chain of Custody Standard were included in the Audit Scope.				
	Surveillance Audit (9 – 10 September 2021) Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of Aluminium and Aluminium alloy foils.				
	The supply chain activities include in the Audit Scope:  • Post-Casthouse				

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

Re-Certification Audit and Scope Change (1 - 2 December 2022)

Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of Aluminium and Aluminium alloy foils.

The supply chain activities include in the Audit Scope:

Post-Casthouse

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

#### Surveillance Audit (25 October 2024)

The Audit Scope covered the Shanghai Sunho Aluminum Foil Co., Ltd. located in Shanghai, China which carries out the manufacture of Aluminium and Aluminium alloy foils.

The supply chain activities include in the Audit Scope:

Post-Casthouse

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

	T C		

#### 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

10 January 2023 - 1 March 2027

#### NEXT AUDIT TYPE

Re-Certification Audit

#### **NEXT AUDIT DUE DATE**

1 March 2027

#### CERTIFICATE NUMBER

65



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

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**

Shanghai Sunho Aluminum Foil Co., Ltd (the 'Entity') is a wholly owned subsidiary of Henan Sunho Group Co., Ltd (SZ.000933) and was established in March 2004. It is located in the Shanghai Pudong Kangqiao Industrial Zone, near the intersection of Shenjiang South Road and Xiuyan Road, and covers an area of 368 mu (24.53 hectares), 12 kilometres from Pudong International Airport and adjacent to Shanghai Disneyland.

The Entity is a precision Aluminium foil processing, manufacturing and service supplier based in China. They produce a wide range of Products with thicknesses ranging from 0.060mm to 0.0045mm. Their Products are widely used in the packaging of food, beverage, cigarettes, medicine and cream products, as well as in thermal insulation materials, video cables and various other industries. Their Products meet upscale capacitor foil quality and technical index requirements.

The main production equipment includes three 2,150mm wide foil mills, three separators and one doubler, and a work roll grinding machine.

#### **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
SYSTEMS	High
RISKS	Medium
PERFORMANCE	Low
OVERALL	MEDIUM

### **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/HENAN-SUNHO-COALPOWER-COLTD">https://aluminium-stewardship.org/about-asi/members/HENAN-SUNHO-COALPOWER-COLTD</a>		
1.2 CoC Management System	Conformance	The Entity has established Policies, systems, procedures and processes that comply with ASI Chain of Custody Standard Criteria regarding a Management System. The Entity's Management System has the capacity to handle ASI Chain of Custody (CoC) Material. The Entity has an integrated Management System underpinned by ISO 9001:2015 The Entity's ISO 9001:2015 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. The Entity assesses the effectiveness of the ASI CoC management and addresses potential areas of non-conformance and improvement. The latest management review was conducted in November 2024.		
1.4 Management Representative	Conformance	The Entity has appointed a member of management as the responsible person to ensure conformance with the ASI Chain of Custody Standard and has defined roles and responsibilities to manage the CoC system.		
1.5 Communications and Training	Conformance	The Entity has delivered training courses to relevant personnel to raise awareness of CoC requirements and ensure competence in their responsibilities under the ASI Chain of Custody Standard.		
1.6 Records Management	Conformance	The Entity has established the record management procedure based on ISO 9001 management procedure to maintain records (Management System) covering all applicable requirements of the ASI Chain of Custody Standard, including the retention requirement of ASI records.		
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the Input and Output Quantities of CoC Materials flowing into/out of the Entity during the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The Entity reported an Input of 8,588 tonnes of ASI Aluminium with 7,523 tonnes of ASI Aluminium Output.		
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the Input and Output Quantities of Eligible Scrap flowing into/out of the Entity during the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The Entity reported no Eligible Scrap Input or Output in 2023.		
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the Inflow and Outflow Quantities of Non-CoC Materials flowing into/out of the Entity during the previous calendar year to the ASI		

CRITERION	RATING	COMMENT
		Secretariat within six months after the end of each calendar year. The Entity reported the Inflow and Outflow Quantities of Non-CoC Materials for 2023.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	According to the Entity's CoC Management Manual, the Entity reports 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 Entity reported the Positive Balance of ASI Aluminium carried over to 2024 as 1,065 tonnes.
1.7e Reporting to ASI (Positive Balance used)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the Positive Balance used in the previous calendar year to the ASI Secretariat within six months after the end of each calendar year. The Entity reported a zero Positive Balance for 2023.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the data of 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 Entity reported no Internal Overdraw in 2023.
1.7g Reporting to ASI (Intra- Entity Flows)	Conformance	According to the Entity's CoC Management Manual, the Entity reports the data of Intra-Entity Flows to the ASI Secretariat within six months after the end of each calendar year. The Entity reported no ASI Aluminium transferring between supply chain activities in 2023.
2. OUTSOURCING CONTRAC	TORS	
2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.1 Certification Scope  2.2a Control of CoC Material (Legal ownership or control)	Not Applicable  Not Applicable	Contractors for the purposes of further processing, treatment or
2.2a Control of CoC Material (Legal ownership		Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or
2.2a Control of CoC Material (Legal ownership or control)  2.2b Control of CoC Material (No further	Not Applicable	Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or
2.2a Control of CoC Material (Legal ownership or control)  2.2b Control of CoC Material (No further outsourcing)  2.2c Control of CoC	Not Applicable  Not Applicable	Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.  This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or

CRITERION	RATING	COMMENT
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
3. PRIMARY ALUMINIUM: CRIT	TERIA FOR ASI BAUX	(ITE, 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.
4. RECYCLED ALUMINIUM: CR	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.
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.

CRITERION	RATING	COMMENT		
5. CASTHOUSES: CRITERIA FOR 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 systems in place to ensure that it is producing ASI Aluminium only from the eligible supplier that is certified to the ASI Chain of Custody Standard, which is clearly specified in the ASI CoC Management Manual. Information in the CoC Material Accounting System indicates that all ASI Aluminium is sourced from ASI CoC Certified suppliers.		
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity has been certified to the ASI Performance Standard since 2019:  https://aluminium-stewardship.org/about-asi/members/HENAN-SUNHO-COALPOWER-COLTD		
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has systems in place to ensure that ASI Aluminium is purchased only from eligible Entities directly or indirectly via a metals Trader and the associated CoC Documents are provided or verified by the ASI CoC Certified Entity. The Material Accounting System is in Excel format, and data in the CoC Material Accounting System indicates that all ASI Aluminium is sourced from ASI CoC Certified Entities and no Aluminium is purchased from trading companies.		
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 developed a Suppliers Code of Conduct and a responsible sourcing Policy that addresses anti-Corruption. The Entity has a process to qualify suppliers. The Due Diligence Purchasing Policy is available at:  http://www.shalfoil.com/NewsDetail.aspx?ID=3016		
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has a responsible purchasing Policy that addresses responsible sourcing. All major next-tier suppliers are informed of the Policy and have signed a Commitment Letter of Responsible Purchasing. The Due Diligence Purchasing Policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016		
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has a responsible purchasing Policy that addresses Human Rights Due Diligence. All identified major next tier suppliers are communicated with the policy and signed the Commitment Letters of Responsible Purchasing. The Due Diligence Purchasing Policy is available at:		

CRITERION	RATING	COMMENT
		http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has a responsible sourcing Policy that addresses Conflict-Affected and High-Risk Areas. Relevant training has been provided to employees. All identified major next-tier suppliers are communicated with on the Policy and signed the Commitment Letters of Nonconflict-Mineral. The Due Diligence Purchasing Policy is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a responsible sourcing framework for suppliers that includes a risk assessment and qualification process. The Entity has assessed the risks of non-compliance with its responsible sourcing Policy by its suppliers of Non-CoC Material. Measurable risk mitigation has been undertaken where risks of adverse impacts are identified. The Entity also conducts second-party audits of its major next-tier suppliers.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has a whistleblower/complaints channel to enable employees and external Stakeholders to report anonymously potential misconduct. The channel is available at: http://www.shalfoil.com/NewsDetail.aspx?ID=3016
8. MASS BALANCE SYSTEM: C	COC MATERIAL AND	ASI ALUMINIUM
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.
8.2 Material Accounting Period	Conformance	The Entity's CoC Management Manual has defined the Material Accounting Period as a 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 determines the Inflow Quantity of Eligible Scrap and Recyclable Scrap Material based on an assessment of Aluminium content.
8.4 Output Quantities of CoC Material	Conformance	In the Entity's Material Accounting System, the available Quantities of CoC Material for Output are 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's CoC Management Manual defines the Output Quantity of CoC Material shall be designated as 100% CoC Material. This was verified during the Audit.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's CoC Management Manual defines the Entity designate the relevant proportion of Scrap generated in the production processes as Eligible Scrap using the same percentage share for its Output of ASI Aluminium. To date, no process Scrap has been designated as Eligible Scrap.

CRITERION	RATING	COMMENT
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's CoC Management Manual defines 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 set up to provide a warning if the Input Percentage of CoC Material is exceeded.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established processes within the Material Accounting System to ensure the Internal Overdraw does not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period. There was no Overdraw for the Entity in 2023.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has established processes within the Material Accounting System to control the Internal Overdraw under a Force Majeure situation. There was no Overdraw for the Entity in 2023.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has established processes within the Material Accounting System to control Internal Overdraw under a Force Majeure situation and the Internal Overdraw shall be made up within the subsequent Material Accounting Period. There was no Overdraw for the Entity in 2023.
8.9a Positive Balance (Carry over)	Conformance	The Entity has established processes within the Material Accounting System to control a Positive Balance (carry over). The Positive Balance in 2023 was 1,065 tonnes.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established processes within the Material Accounting System to control a Positive Balance (carry over). A 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. This was verified during the Audit.
9. ISSUING COC DOCUMENT	S	
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 issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product and includes a reference number: CoC + SH + year + serial number. All issued CoC Documents have the reference number following the defined rule.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the identity, address and CoC Certification number of the Entity.

CRITERION	RATING	COMMENT
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the identities and addresses of the customers receiving the CoC Material, and their CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents are reviewed and approved by the responsible persons before it is issued to customers.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard".
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the type of CoC Materials in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the mass of CoC Materials in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product. All issued CoC Documents include the mass of total materials in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's CoC Management Manual defines that it will issue a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product, and includes Sustainability Data as requested by the customer. The data is based on the Life Cycle Assessment Report, published on the Entity's website. To date, no such request has been received.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product, and includes Sustainability Data as requested by the customer. To date, no such request has been received.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product, and includes Sustainability Data as requested by the customer. To date, no such request has been received.
9.3d Sustainability Data (optional) - Post- Casthouse ASI Certification status	Conformance	The Entity issues a CoC Document using the ASI CoC Document template for each lot of CoC Material/Product, or follows the requirement of the customer. All issued CoC Documents include the Entity's ASI Certification Status for the ASI Performance Standard.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity has established, implemented, and maintained a Management System against the ASI Performance Standard including GHG emissions calculation, and the information in the CoC Document is based on the Output of this Management System. No

CRITERION	RATING	COMMENT
		Supplementary Information is provided in the issued CoC Documents as there have been no customer requests to date.
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 Documents issued by the Entity. No verification requests have been received to date.
9.6 Error (Shipping)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has a process to record the errors, analyse the root cause, and implement associated corrective action to prevent reoccurrence. No errors in the CoC Documents have been found.
10. RECEIVING COC DOCUME	ENTS	
10.1 Verification of CoC Documents	Conformance	The Entity has implemented a process to verify the required information in the received CoC Documents. The required information in the received CoC Documents has been included.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented a process to verify the required information in the received CoC Documents.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has developed a process to verify the supplier's ASI CoC Certification Status. The Certification Status of the supplier issuing the CoC Documents is verified by the Entity.
10.4 Error (Reception)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has a process to record the errors, analyse the root cause, and implement associated corrective action to prevent reoccurrence with suppliers. No errors in CoC Documents have been found in 2023 and 2024.
11. CLAIMS AND COMMUNICA	ATIONS	
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity's ASI CoC Management Manual defines that all claims and communications must follow the ASI Claims Guide including communication with the ASI Secretariat, and the relevant roles and responsibilities are defined. No claims are found to violate the requirements defined in the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	Integrated with the ISO 9001 Quality Management System, the Entity has implemented the document and record management procedure to ensure that claims are made in a consistent manner with the ASI Claims Guide and are verifiable. There is no claim made by the Entity except for the CoC Documents.
11.1c Claims and Communications (Employee training)	Conformance	The Entity provides training courses on claims and communications to the relevant employees. Evidence of training conducted, and ongoing planned training was reviewed.

#### 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	10 January 2020	Issued
1	2 June 2021	Updated to reflect a change in the name of the Member to Shanghai Sunho Aluminum Foil Co., Ltd.
2	22 November 2021	Surveillance Audit; Audit Scope description expanded to include supply chain activities and the criteria included; Criterion 2.5 was not included in Revision 0 or 1 in error and has been updated in Revision 2 with no change to the public headline statement between revisions.
3	2 February 2023	Re-Certification Audit - Full Certification. Scope Change to apply CoC Standard V2.
4	10 September 2024	Individual ASI Membership for Shanghai Sunho Aluminum Foil Co., Ltd was superseded and the Entity has been included under the HENAN SUNHO COAL & POWER CO., LTD membership.
5	20 February 2025	Surveillance Audit Adjusted Certification Scope wording to improve legibility; Revised the Audit Scope description for all previous Audits to remove reference to the ASI Performance Standard.
6	20 March 2025	Extension to the Certification expiry date (from 9 January 2026) and the Next Audit Type and Due Date, consistent with ASI's voluntary option for CoC Standard Certification extensions.