

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Anhui Maximum Aluminium Industries Co., Ltd.

CERTIFICATE NUMBER

453

ASI STANDARD

CHAIN OF CUSTODY  
STANDARD  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE SERVICES  
UK LTD.

DATE OF ISSUE

25 APRIL 2025

DATE OF EXPIRY

24 APRIL 2028

CERTIFIED SINCE

25 APRIL 2025

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the Aluminium Stewardship Initiative Ltd.

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

Anhui Maximum Aluminium  
Industries Co., Ltd., located at No.  
88, Yinghua West Road, Suixi  
Economic Development Zone,  
Huaibei, Anhui, China.

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Anhui Maximum Aluminium Industries Co., Ltd.
CERTIFICATION SCOPE	Anhui Maximum Aluminium Industries Co., Ltd., located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouse</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</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 26 - 27 December 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 26 February 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the production process of Aluminium ingot remelting, casting and cold rolling of Anhui Maximum Aluminium Industries Co., Ltd. at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei, Anhui, China.</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>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li><li>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li>☑ 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>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>

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CERTIFICATION PERIOD	25 April 2025 – 24 April 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	24 October 2026
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CERTIFICATE NUMBER	453
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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

Anhui Maximum Aluminium Industries Co., Ltd. is located at No. 88, Yinghua West Road, Suixi Economic Development Zone, Huaibei City, Anhui Province. It began operations in April 2013 and was fully acquired in 2017 by Jiangsu Zhongji Composite Material Co., Ltd, a subsidiary of Wanshun New Material, after which it was renamed Anhui Zhongji Battery Foil Technology Co., Ltd.

Initially comprising three major workshops—casting, cold rolling, and foil rolling—the casting and cold rolling workshops were separated from Anhui Zhongji at the end of 2022 and re-established as Anhui Maximum Aluminium Industries Co., Ltd (the 'Entity'). The Entity specialises in producing Aluminium plate strips with an annual production capacity of 60,000 tonnes. Its key processes include casting, rolling, and cold rolling.

The Entity operates two plants, a canteen building, and an office building, employing over 170 persons.

## 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.

OVERALL	
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. MANAGEMENT SYSTEM AND RESPONSIBILITIES</b>		
1.1 ASI Membership	Conformance	The Entity is an active ASI member in the Production and Transformation class, committed to fulfilling its membership obligations and complying with the ASI Complaints Mechanism. Membership details are available at: <a href="https://aluminium-stewardship.org/about-asi/members/Jiangsu-Zhongji-Lamination-Materials-Co---Ltd">https://aluminium-stewardship.org/about-asi/members/Jiangsu-Zhongji-Lamination-Materials-Co---Ltd</a>
1.2 CoC Management System	Conformance	The Entity has established Policies, systems, procedures and processes to comply with ASI Chain of Custody (CoC) Standard, and its Management System is capable of handling ASI CoC Material.
1.3 CoC Management System Monitoring	Conformance	The Entity has established mechanisms for the periodic review of the Management System, in compliance with its ASI Management Manual. This review assesses the effectiveness of the ASI CoC management and identifies areas for improvement or Non-Conformance. The most recent management review was conducted in December 2024.
1.4 Management Representative	Conformance	The Entity has designated a Management Representative for its ASI CoC Standard implementation and management, with defined roles and responsibilities.
1.5 Communications and Training	Conformance	Based on the Quality Management System (QMS), the Entity has established and implemented an internal training process addressing ASI Chain of Custody (CoC) requirements. Training is categorised into two main areas: 1. basic ASI knowledge for new employees; and 2. specialised training for staff in procurement, sales, and production roles involved in CoC Material management. This training ensures that relevant personnel understand and can fulfill their responsibilities under the ASI CoC Standard. Training plans, materials, and records are maintained by the Entity.
1.6 Records Management	Conformance	In compliance with Management Systems including ISO 9001, ISO 14001, and ISO 45001, record control for the implementation of the ASI CoC Standard is defined. All related records are maintained in the Entity's Enterprise Resource Planning (ERP) system. An annual financial Audit verifies the accuracy of Material records.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the Input and Output Quantities of CoC Material from the previous calendar year to the ASI Secretariat within six months after year-end, (i.e. by end of March).
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the Input and Output Quantities of Eligible Scrap from the previous calendar year to the ASI Secretariat within six months after year-end, (i.e. by end of March). Currently, there has been no Eligible Scrap Input or Output due to the absence of an ASI Aluminium Product contract.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the Inflow and Outflow Quantities of Non-CoC Material from the

CRITERION	RATING	COMMENT
		previous calendar year to the ASI Secretariat within six months after year-end.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the maximum Positive Balance carried over to subsequent Material Accounting Period from the previous calendar year to the ASI Secretariat within six months. As no CoC Material was input in 2024, no Positive Balance has been carried over to the next Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the Positive Balance used from the previous calendar year to the ASI Secretariat within six months. There is no Positive Balance for 2024, as no CoC material was inputted in 2023.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity's Chain of Custody Management Manual requires reporting Internal Overdraw drawn from the subsequent Material Accounting Period to the ASI Secretariat within six months of the end of each calendar year. Currently, there have been no Internal Overdraw drawn from the subsequent Material Accounting Period, as there is no CoC Material within the Entity.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's Chain of Custody Management Manual requires reporting the Quantities of CoC Material/s transferred between supply chain activities within the Entity (Intra-Entity Flows), to the ASI Secretariat within six months after the end of each calendar year. The entire production of the Product is undertaken internally, with no Outsourcing or transfer activities of CoC Materials within the supply chain.
<b>2. OUTSOURCING CONTRACTORS</b>		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
<b>3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM</b>		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
4.1a Recycled Aluminium (CoC Certification Scope)	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.

CRITERION	RATING	COMMENT
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.
<b>5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established procurement processes and approved supplier management procedures. Through supplier assessments and procurement approval processes, it ensures that ASI Aluminium is sourced only from Casthouses within its CoC Certification Scope or from other ASI certified Entities.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity is certified against the ASI Performance Standard and the Audit Scope of the Entity's Certification includes the Casthouse.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity maintains a control and procurement management process to ensure that all ASI Aluminium is sourced, either directly or indirectly, from an ASI CoC Certified Entity.
5.2 Unique Identification	Minor Non-Conformance	<p>The Entity operates a Quality Management System certified against ISO 9001, ensuring control over Product identification and traceability. Both lot and roll numbers are used throughout various stages of the production process. Through this identification system, ASI Aluminium is tracked and recorded in the Material Accounting System and associated with the Input Quantity of CoC Material for the corresponding Material Accounting Period.</p> <p>However, it is currently not clear whether a specific batch of Products is ASI Aluminium based solely on the serial number at the production site, due to the absence of a proprietary coding system specific to ASI Aluminium.</p>
<b>6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM</b>		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's system in place guarantees that ASI Aluminium is produced exclusively from the Post-Casthouse operations that are within the Entity's CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	<p>The Entity has established a system to ensure that it produces ASI Aluminium exclusively using Inputs from sources certified under the ASI Performance Standard. The Entity is certified against the ASI Performance Standard and related information is available at: <a href="https://aluminium-stewardship.org/about-asi/members/Jiangsu-Zhongji-Lamination-Materials-Co---Ltd">https://aluminium-stewardship.org/about-asi/members/Jiangsu-Zhongji-Lamination-Materials-Co---Ltd</a></p>
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has established a system to ensure that ASI Aluminium is sourced either directly from another ASI CoC Certified Entity, or via a metals Trader or warehouse, provided that suppliers can supply an associated CoC Document. This Document must include Supplementary Information that identifies the specific shipment and verifies the authenticity of the CoC Document.
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		



CRITERION	RATING	COMMENT
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy that incorporates key requirements of the ASI Performance Standard, including Anti-Corruption. This Policy is available for review at: <a href="https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20241017134353.doc&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20241017134353.doc&amp;wdOrigin=BROWSELINK</a></p> <p>Additionally, the Entity's Procurement Department has communicated the relevant provisions of this Policy to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material provided via a Trader.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy that incorporates key requirements of the ASI Performance Standard, including Responsible Sourcing. Additionally, the Entity's Procurement Department has communicated the relevant provisions of this Policy to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material provided via a Trader.</p>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy that incorporates key requirements of the ASI Performance Standard, including Human Rights Due Diligence. Additionally, the Entity's Procurement Department has communicated the relevant provisions of this Policy to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material provided via a Trader.</p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy that incorporates key requirements of the ASI Performance Standard, including Conflict-Affected and High-Risk Areas (CAHRAs). Additionally, the Entity's Procurement Department has communicated the relevant provisions of this Policy to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material provided via a Trader.</p>
7.2 Risk Assessment and Mitigation	Minor Non-Conformance	<p>The Entity has established criteria to identify those suppliers that may be of higher risk of non-compliance and then conducts a risk assessment. For those suppliers identified as high-risk, a self-assessment form is required to evaluate compliance with the relevant ASI Performance Standard. Based on the results, Corrective Action requests are issued.</p> <p>However, the Entity has not conducted on-site verification of the self-assessment forms submitted by suppliers, resulting in inadequate assessment of supplier risk.</p>
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has established a 'whistle-blower' channel accessible to both internal and external Stakeholders. Details on these channels are outlined in the Responsible Purchasing Policy at: <a href="https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20241017134353.doc&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Fcn.ahzjalufoil.com%2Fupload%2F20241017134353.doc&amp;wdOrigin=BROWSELINK</a></p> <p>To date, no Complaints have been received.</p>
8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>The Entity oversees its production activities, including the Input and Output of all materials and Products, through a digital Manufacturing Execution System (MES). Leveraging this system, the Entity has developed an Excel-based ASI Aluminium Material balance sheet to</p>

CRITERION	RATING	COMMENT
		maintain the integrity of the Mass Balance for CoC Materials and Eligible Scrap within its Certification Scope.
8.2 Material Accounting Period	Conformance	The Material Accounting Period in the Entity's Chain of Custody Management Manual, is defined as the calendar year, from 1 January to 31 December.
8.3 Input and Inflow Quantities	Conformance	The Entity will document the Quantities of each CoC Material Input, as well as the Quantities of Non-CoC Material Inflow to the Certification Scope. No Eligible Scrap or Recyclable Scrap Material is used in the production process. At the time of the Audit, there was no ASI Material present in the Entity's supply chain.
8.4 Output Quantities of CoC Material	Conformance	The Entity's Material Accounting System stipulates that the available Quantities of CoC Material for Output will be determined by the Input Quantities of 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 Material Accounting System stipulates that the Output Quantity of CoC Material, which may be a subset of total production, shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's Material Accounting System stipulates that the Entity will designate the relevant proportion of Scrap generated during its production processes as Eligible Scrap, applying the same percentage share as the Output of ASI Aluminium.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System stipulates that the total Output of CoC Material does not proportionally exceed the Input Percentage of CoC Material over the Material Accounting Period. A simulation case undertaken during the Audit demonstrated the Entity's understanding and compliance with this requirement.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Material Accounting System stipulates that the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period if an Overdraw is necessary.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System stipulates that an Internal Overdraw is only permitted when CoC Material is contracted for delivery, but Force Majeure situation prevents timely delivery, and the Internal 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's Material Accounting System stipulates the Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System stipulates that the carry over of a Positive Balance shall be clearly identified in the Entity's Material Accounting System.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System stipulates a Positive Balance generated in one Material Accounting Period and carried over to the

CRITERION	RATING	COMMENT
		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 uses the CoC Document Template from the ASI CoC Standard for each shipment or transfer of CoC Material to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity uses the CoC Document template defined in the ASI CoC Standard for each shipment or transfer of CoC Material sent to other CoC Certified Entities or Traders, including the Date of Issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity uses the CoC Document template defined in the ASI CoC Standard for each shipment or transfer of CoC Material sent to other CoC Certified Entities or Traders, including the reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity uses the CoC Document template defined in the ASI CoC Standard for each shipment or transfer of CoC Material sent to other CoC Certified Entities or Traders, including, including the issuing Entity, company address and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity issues a CoC Document for each Material/Product lot, which includes the receiving customer and its CoC Certification number if certified under the ASI CoC Standard.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's Chain of Custody Management Manual stipulates that the Sales Representative is responsible for verifying and signing of the CoC Documents. Sampled CoC Documents demonstrates that the Entity understands and complies with this requirement.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's Chain of Custody Management Manual stipulates that if the customer requests the CoC Document in its own format, the Entity shall comply. If no specific format is requested, the Entity will issue a CoC Document for each Material/Product lot using the CoC Document Template defined in the ASI CoC Standard. Both formats must include the statement: 'The information provided in the CoC Document is in Conformance with the ASI CoC Standard.' Sampled CoC Documents demonstrates that the Entity understands and complies with this requirement.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity issues CoC Documents for each lot of Material/Product using the template defined in the ASI CoC Standard, including the type of CoC Material. Sampled CoC Documents demonstrates the Entity's understanding of the requirements and compliance.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity issues CoC Documents for each lot of Material/Product using the template defined in the ASI CoC Standard, including the mass of CoC Material in the shipment. Sampled CoC Documents demonstrates that the Entity's understanding of the requirements and compliance with them.

CRITERION	RATING	COMMENT
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity issues CoC Documents for each lot of Material/Product using the template defined in the ASI CoC Standard, including the mass of total Material. Sampled CoC Documents demonstrate that the Entity's understanding of the requirements and compliance.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's Chain of Custody Management Manual states that the sustainability data is not provided by default. If requested by a customer, the Marketing and Sales Department will share the Life Cycle Assessment (LCA) Report. Sampled CoC Documents confirm that sustainability data, such as carbon footprint information, is currently not included.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity's Chain of Custody Management Manual states that sustainability data is not provided by default. However, if requested, the Entity will share origin information with the customer. A review of sampled CoC Documents confirms that sustainability data, such as origin information, is currently not included.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity's Chain of Custody Management Manual states that sustainability data, including recycled content information, is not provided by default. If requested by a customer, the Marketing & Sales department will share this information. Sampled CoC Documents confirm that sustainability data, such as methodologies for Pre-Consumer and Post-Consumer Scrap, is currently not included in the CoC documentation.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity's Chain of Custody Management Manual states that sustainability data, including ASI Certification Status, is not provided by default. If requested by a customer, the Entity will share the information. Sample CoC Documents confirm that sustainability data, such as the ASI Performance Standard Certification Status, is currently not included.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity's Chain of Custody Management Manual states that sustainability data is not provided by default. If requested by a customer, the Entity commits to sharing the information along with Objective Evidence. Sampled CoC Documents confirm that, aside from the requirements outlined in the ASI CoC Standard, customers have not requested any additional information or supplements.
9.5 Verification of Information	Minor Non-Conformance	The Entity defines the responsibilities and process for responding to verification requests related to information within its CoC Documents.  However, the CoC Document does not include contact details, such as email addresses or hotline numbers, for Stakeholders to submit verification requests.
9.6 Error (Shipping)	Conformance	Integrated with its ISO 9001 Quality Management System, the Entity has a process to record errors, analyse root cause, and implement Corrective Actions to prevent the recurrence.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has implemented a process to verify required information in the received CoC Documents, as mandated by the ASI Chain of Custody Standard.

CRITERION	RATING	COMMENT
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented a process to verify required information in the received CoC Documents, as mandated by the ASI Chain of Custody Standard.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has implemented a process to verify the supplier's ASI CoC Certification Status at: <a href="https://aluminium-stewardship.org/about-asi/members">https://aluminium-stewardship.org/about-asi/members</a>
10.4 Error (Reception)	Conformance	The Entity has a process to record errors, provide feedback to suppliers, and require Corrective Actions to prevent recurrence.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity's ASI CoC Management Manual requires all Claims and communications to follow the ASI Claims Guide, including communication with the ASI Secretariat, and outlines the relevant roles and responsibilities. During the Audit, use of the Claims system was not observed, as no ASI CoC Materials were present in the Entity's supply chain.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity assigns roles and responsibilities to ensure Claims align with the ASI Claims Guide. During the Audit, use of the Claims system was not observed, as no ASI CoC Materials were present in the Entity's supply chain.
11.1c Claims and Communications (Employee training)	Conformance	The Entity provides Claims and communication training 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	25 April 2025	Initial Certification Audit – Full Certification