

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CHINALCO-SWA Co., Ltd.

CERTIFICATE NUMBER

347

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

8 MARCH 2024

DATE OF EXPIRY

7 MARCH 2027

CERTIFIED SINCE

8 MARCH 2024

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

*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

Manufacturing of aluminum plates
and strips at the CHINALCO-SWA
Co., Ltd. production plant (China).

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	CHINALCO-SWA CO.,Ltd.
ENTITY NAME	CHINALCO-SWA Co., Ltd.
CERTIFICATION SCOPE	Manufacturing of aluminum plates and strips at the CHINALCO-SWA Co., Ltd. production plant (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">12 – 13 October 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2023
AUDIT SCOPE	<p>The audit scope included the manufacturing of aluminum plates and strips at the CHINALCO-SWA Co., Ltd. production plant (China).</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Post-Casthouse <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"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	8 March 2024 – 7 March 2027
NEXT AUDIT TYPE	Re-Certification Audit

NEXT AUDIT DUE DATE	7 March 2027
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CERTIFICATE NUMBER	347
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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.

ENTITY OVERVIEW

The CHINALCO-SWA CO., Ltd. facility is located in Xipeng, Jiulongpo District, Chongqing and was established in 2004. The Entity is located within an industrial park developed by the local government and the area under management is approximately 235,000 square meters. It mainly produces aluminium and aluminium alloy plates, strips, foils, tubes, rods, profiles and forgings, forming a series of pillar products for aerospace, transportation, electronic information, packaging and printing, building decoration and other aluminium products.

The Entity employs approximately 397 employees on site, and most employees are from the local area. The Entity is in close contact with surrounding communities.

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	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity has been an ASI Member since June 2021 in the Production and Transformation class.
1.2 CoC Management System	Conformance	The Entity has established a Management System that can handle ASI CoC Material. The Entity has an integrated Management System underpinned by ISO 9001 and addresses all applicable requirements of the ASI Chain of Custody Standard.
1.3 CoC Management System Monitoring	Conformance	The Entity has established a process to review the Management System at least once every 12 months to assess its effectiveness and to address potential areas of Non-Conformance. This was evidenced in the ASI CoC Management Manual and will be managed as part of the Entity's ISO 9001 Quality Management System.
1.4 Management Representative	Conformance	The Entity has appointed the Vice General Manager as the ASI Management Representative to have overall responsibility for the implementation of the ASI Chain of Custody Standard and Conformance with all applicable requirements.
1.5 Communications and Training	Minor Non-Conformance	<p>The Entity has developed and implemented communications and training measures to ensure relevant personnel are aware of and competent in their responsibilities under the ASI Chain of Custody Standard. Adequate training is provided.</p> <p>However, not all staff understood the CoC Management System requirements fully, in particular the requirement for recording received CoC Documents.</p>
1.6 Records Management	Conformance	The Entity has established a Records Management Procedure based on the ISO 19001 Management System procedure, which covers all records applicable to the ASI Chain of Custody Standard with a retention period of a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
1.7d Reporting to ASI (Positive Balance carried over)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
1.7g Reporting to ASI (Intra-Entity Flows)	Not Applicable	This Criterion is not applicable for the initial Certification Audit.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors in the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
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.
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)	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.

CRITERION	RATING	COMMENT
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has established systems to ensure that production of ASI Aluminium is only from the Facilities that are within the Entity's CoC Certification Scope. This was evidenced in the CoC Document Control Procedure.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity has established a system to ensure that they are certified to the ASI Performance Standard within two years of joining ASI.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	<p>The Entity has established systems to ensure that ASI Aluminium is purchased only from the eligible Entities/Facilities directly, or indirectly, via a metals Trader.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of sourcing and transfer of CoC Material.</p>
7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has established a Responsible Sourcing Policy, which addresses anti-Corruption. All identified major next-tier suppliers are informed about the Policy and have signed a Business Ethics Commitment Letter.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has established a Responsible Purchasing Policy, which addresses the requirements for responsible sourcing. All major next-tier suppliers are informed about the Policy and have signed a Responsible Purchasing Commitment Letter.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has established a Responsible Purchasing Policy, which addresses the requirements on Human Rights Due Diligence. All identified major next-tier suppliers are informed about the Policy and have signed a Responsible Purchasing Commitment Letter.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has established a Responsible Sourcing Policy, which addresses Conflict-Affected and High-Risk Areas. All identified major next-tier suppliers are informed about the Policy and have signed a Non-Conflict-Mineral Commitment Letter.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a Responsible Sourcing Policy and Supplier Code of Conduct, which are signed by suppliers and a Due Diligence risk assessment is undertaken prior to commencing business with the supplier. If a supplier is not compliant with the requirements and repeatedly fails to correct critical findings, contracts will be terminated.
7.3 Complaints Resolution Mechanism	Conformance	This Entity has established and operated a Stakeholder complaints, grievances and requests procedure, which ensures the Entity's contact telephone number, email address, suggestion box and other information is disclosed to Stakeholders by through public boards,

CRITERION	RATING	COMMENT
		accepting information requests, complaints and appeals from all parties. The Human Resources Department monitors the requests and complaints of Stakeholders and has an appropriate resolution mechanism.
8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that can record Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass.
8.2 Material Accounting Period	Conformance	The Material Accounting Period is defined as a 12-month calendar year (January 1 to December 31).
8.3 Input and Inflow Quantities	Conformance	The Entity has established a Management System that includes a Material Accounting System that records Input and Inflow Quantities of CoC Material and Non-CoC Material, by mass.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Management System that includes a Material Accounting System that records Output Quantities of CoC Material, by mass.
8.5 Indivisibility of CoC Material	Conformance	The Output Quantity of CoC Material, which may be a part of the total production volume, is designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity, as it does not produce Pre-Consumer Scrap from its processing in order to designate the relevant proportion as Eligible Scrap.
8.7 Consistency Between Input Percentage and Total Output	Conformance	<p>The Entity's accounting system is developed to have updated information on the inventory balance on a frequent basis.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Material available in the Entity's supply chain.</p>
8.8a Internal Overdraw (Not exceed 20%)	Conformance	<p>The principle of Internal Overdraws to not exceed 20% is defined in the CoC Management Manual.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Material available in the Entity's supply chain.</p>
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	<p>The principle of Internal Overdraws to not exceed the amount of CoC Material affected by a Force Majeure situation is defined in the Entity's CoC Management Manual.</p> <p>At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Material was available in the Entity's supply chain.</p>
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's CoC Management Manual defines how the Internal Overdraw is made up within the subsequent Material Accounting Period.

CRITERION	RATING	COMMENT
		At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Material available in the Entity's supply chain.
8.9a Positive Balance (Carry over)	Conformance	<p>The Entity has established a Material Accounting System in accordance with the ASI Chain of Custody Standard requirements.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Materials available in the Entity's supply chain.</p>
8.9b Positive Balance (Expiry)	Conformance	<p>The Entity has established a Material Accounting System in accordance with the ASI Chain of Custody Standard requirements. The system ensures that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Material in the Entity's supply chain.</p>
9. ISSUING COC DOCUMENTS		
9.1 CoC Document	Conformance	<p>The Entity has established a system that can issue a CoC Document for each shipment and transfer, ensuring that these are controlled, issued and stored.</p> <p>At the time of the audit, actual implementation of the system had not yet occurred due to the absence of ASI CoC Material available in the Entity's supply chain.</p>
9.2a CoC Document Content (Date of issue)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the issue date.
9.2b CoC Document Content (Reference number)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the reference number for the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the identity, address and CoC Certification Number of the Entity issuing the CoC Document.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification Number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the responsible employee, who can verify the information in the CoC Document.

CRITERION	RATING	COMMENT
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template that includes a 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 has established a CoC Document Control Procedure, which includes a CoC Document template with information on the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity has established a CoC Document Control Procedure, which includes a CoC Document template with information on the mass of total Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity, as the CoC Document template currently does not include Sustainability Data.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable to the Entity, as the CoC Document template currently does not include Sustainability Data.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity, as the CoC Document template currently does not include Sustainability Data.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity, as the CoC Document template currently does not include Sustainability Data.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable to the Entity, as the CoC Document template currently does not include Supplementary Information.
9.5 Verification of Information	Conformance	The Entity's Material Accounting System enables it to respond to reasonable requests for verification of information in the CoC Documents.
9.6 Error (Shipping)	Conformance	The Entity's Material Accounting System includes a process for the documentation of errors, the agreed steps taken to correct them, and actions to avoid recurrence.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has required procedures and routines to verify that all required information in the received CoC Documents are included.
10.2 Verification of Consistency Between CoC	Conformance	The Entity's Material Accounting System includes the verification of received CoC Documents with the accompanying CoC Material for

CRITERION	RATING	COMMENT
Documents and CoC Material		consistency before recording information in the Entity's Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Minor Non-Conformance	<p>The Entity's Material Accounting System can verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material.</p> <p>However, during the simulation purchase case, the Entity did not keep the verified records as required.</p>
10.4 Error (Reception)	Conformance	The Entity's Material Accounting System can correct any error discovered after the CoC Material has been received and implements actions to avoid reoccurrence.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	<p>The Entity's CoC claims and communications control procedure requires all claims and communications must be consistent with the ASI Claims Guide, including communication with the ASI Secretariat, and the relevant roles and responsibilities are defined.</p> <p>At the time of the audit, actual implementation of the system has not yet occurred due to the absence of ASI CoC Material available in the Entity's supply chain.</p>
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has appointed roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has defined a process to ensure that ASI-related claims are consistent with the ASI Claims Guide. The Entity has provided training to relevant personnel.

ASI LIMITATION OF LIABILITY DISCLAIMER

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 March 2024	Initial Certification Audit – Full Certification
1	30 June 2025	Extension to the Next Audit Type and Due Date (from 7 September 2025), consistent with ASI's voluntary option for CoC Standard Certification extensions