

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Shandong Innovation Group Co., Ltd.

CERTIFICATE NUMBER

500

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SGS-CSTC
STANDARDS
TECHNICAL SERVICES

DATE OF ISSUE

15 OCTOBER 2025

DATE OF EXPIRY

14 OCTOBER 2028

CERTIFIED SINCE

15 OCTOBER 2025

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large 'J' followed by a horizontal line.

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

Recycling and remelting of Aluminium scrap, production of unforged and wrought Aluminium alloys (mainly including Aluminium alloy billets, flat ingots, extrusion profiles and Aluminium alloy parts) at Shandong Innovation Precision Technology Co. Ltd. (China), Inner Mongolia Innovation New Materials Co., Ltd. (China), Inner Mongolia Innovation Lightweight New Materials Co., Ltd. (China) and Yunnan Innovation Alloy Co., Ltd. (China), and central strategic functions at the Shandong Innovation Precision Technology Co., Ltd. headquarters in Shandong (China).

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Shandong Innovation Group Co., Ltd.
ENTITY NAME	Shandong Innovation Group Co., Ltd.
CERTIFICATION SCOPE	Recycling and remelting of Aluminium scrap, production of unforged and wrought Aluminium alloys (mainly including Aluminium alloy billets, flat ingots, extrusion profiles and Aluminium alloy parts) at Shandong Innovation Precision Technology Co. Ltd. (China), Inner Mongolia Innovation New Materials Co., Ltd. (China), Inner Mongolia Innovation Lightweight New Materials Co., Ltd. (China) and Yunnan Innovation Alloy Co., Ltd. (China), and central strategic functions at the Shandong Innovation Precision Technology Co., Ltd. headquarters in Shandong (China).
SUPPLY CHAIN ACTIVITIES	- Aluminium Re-melting/Refining - Casthouses - Post-Casthouse
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	10 – 19 April 2025
AUDIT REPORT SUBMISSION	15 August 2025
AUDIT SCOPE	The Audit Scope included the four production facilities, Inner Mongolia Innovation Lightweight New Materials Co., Ltd.; Inner Mongolia Innovation New Materials Co., Ltd.; Shandong Innovation Precision Technology Co., Ltd.; and Yunnan Innovation Alloy Co., Ltd., and the central strategic functions at Shandong Innovation Precision Technology Co., Ltd. The supply chain activities included in the Audit Scope: - Aluminium Re-melting/Refining - Casthouses - Post-Casthouse All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☒ The information provided by the Entity is true and accurate to the best

knowledge of the Auditor(s) preparing this Report.

- ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☑ The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	15 October 2025 – 14 October 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	14 April 2027
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CERTIFICATE NUMBER	500
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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

Shandong Innovation Group Co., Ltd. (the 'Entity'), established in 2002, is a fully integrated Aluminium alloy material manufacturer with over 20,000 employees and a total annual production capacity of more than five million tonnes. The Entity is made up of four companies within the Shandong Innovation Group.

Shandong Innovation Precision Technology Co., Ltd., established in 2017, is located at Huixian 4th Road, Zouping County Economic and Technological Development Zone, Shandong Province, China, covering an area of 277,000 square meters (m²). It specialises in the research and development (R&D) of high-strength and high-toughness alloy material production technology, precision processing of Aluminium alloy materials, surface treatment of Aluminium alloy profiles and products, and the manufacturing of high-precision, large-section, high-strength, and high-toughness premium Aluminium extrusion products. Its annual production capacity exceeds 300,000 tonnes, with products applied in rail transit, electronics, automotive lightweighting, and construction. Electronic product profiles are primarily sold to domestic electronics manufacturers, while transportation profiles are supplied to rail product manufacturers. The extrusion workshop is equipped with 34 extrusion machines, 80 precision cutting saws, and 24 aging furnaces, integrating a comprehensive industrial chain from cast billets to extruded products. The company also possesses mold processing and product machining capabilities. The company has over 2,900 employees. There are no nearby residential areas, schools, or environmentally sensitive areas. Key stakeholders include governments, clients, employees, industry associations, suppliers, and social organisations.

Inner Mongolia Innovation Lightweight New Materials Co., Ltd. commenced operations in 2022 and is situated in Zone C of Huolinguole Aluminium Industrial Park, Tongliao City, Inner Mongolia Autonomous Region, covering over 85,000 m². The company focuses on the R&D and production of lightweight Aluminium alloy components for transportation and IT accessories. With five extrusion lines, 80 CNC machines, and full process supporting equipment, its annual capacity reaches 60,000 metric tonnes, with plans to expand to 10 lines and an annual output of 100,000 tonnes. Products include automotive battery housings, structural body parts, and industrial profiles, widely used in domestic automotive lightweighting markets with export potential. The company employs over 280 people. There are no residential or environmentally sensitive areas nearby, with the nearest village being Herimute Village. Stakeholders include governments, clients, employees, industry associations, suppliers, and social organisations.

Inner Mongolia Innovation New Materials Co., Ltd., established in August 2023, is located in Zone C of Huolinguole Aluminium Industrial Park, Tongliao City, Inner Mongolia, covering an area approximately 49,000 m², with Herimute Village as the nearest settlement. The company specialises in producing high-strength, high-toughness Aluminium alloy round billets and flat ingots through melting, casting, sawing, and homogenisation processes, with an annual output of 520,000 tonnes. Products are used in rail transit, automotive lightweighting, construction templates, and casting alloys, primarily sold to domestic markets such as Liaoning, Jilin, Hebei, and Shandong. Facilities include one office building, two workshops, a staff dormitory, and a raw material warehouse. The company employs over 400 employees. The surrounding area has no environmentally sensitive sites. Stakeholders include governments, clients, employees, industry associations, suppliers, and social organizations.

Yunnan Innovation Alloy Co., Ltd., founded in 2019, is located in the Green Aluminium Innovation Industrial Park, Ganhe Township, Yanshan County, Wenshan Prefecture, Yunnan Province, covering over 199,000 m². It produces lightweight, high-strength Aluminium alloy round ingots for transportation, industrial products, electronics, communication equipment, construction, and decoration, mainly sold to Guangdong, Sichuan, Hangzhou, and other regions. The facility includes newly built workshops, office buildings, an LNG station, skid-mounted refuelling units, and auxiliary infrastructure. Currently operating 11 production lines with an annual output of 800,000 tonnes, the company plans to expand to 14 lines for a total annual capacity of 1.2 million tonnes. The company employs over 370 people. The site is adjacent to National Highway 303, surrounded by industrial zones with no nearby residential or environmentally sensitive areas. Stakeholders include governments, clients, employees, industry associations, suppliers, and social organisations.

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	Low
RISKS	Medium
PERFORMANCE	Low
OVERALL	LOW

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member in good standing. The Entity's parent company joined ASI in 2023 in the Production and Transformation membership class and is committed to complying with all obligations of ASI Membership and the ASI Grievance Mechanism. The Entity's ASI membership information is available at: https://aluminium-stewardship.org/about-asi/members/Shandong-Innovation-Group-Co---Ltd-
1.2 CoC Management System	Conformance	The Entity has implemented a Management System that meets all applicable requirements of the ASI Chain of Custody Standard in all Facilities under the Entity's control that have Chain of Custody (CoC) Material Custody. The Group has developed an ASI Manual for Shandong Innovation Group Co., Ltd (the Entity).
1.3 CoC Management System Monitoring	Conformance	The Entity has implemented a CoC Management System Internal Audit Procedure that defines that the Management System will be reviewed on an annual basis. The Entity demonstrated it reviews the Management System annually in accordance with its defined procedure and addresses potential areas of Non-Conformance.
1.4 Management Representative	Conformance	The Entity has nominated its General Manager as the ASI Management Representative whose roles and responsibilities are defined in writing and are communicated within the Entity. Within the Entity, there is a team assisting the Management Representative role in the implementation of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has implemented a Communication and Training Procedure for the Chain of Custody Standard. The Entity has established an annual training plan for the ASI CoC Management System, and the training has been implemented according to the training plan.
1.6 Records Management	Conformance	The Entity has issued the ASI CoC Documents and Records Control Procedure. All records are to be retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7c Reporting to ASI (Inflows and Outflows of	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI

CRITERION	RATING	COMMENT
Non-CoC Material)		Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. The Entity's report form includes all the necessary information required for reporting.
1.7g Reporting to ASI (Intra-Entity Flows)	Minor Non-Conformance	The Entity has established a procedure that defines the process for reporting information to the ASI Secretariat in accordance with the ASI Chain of Custody Standard. However, the reporting form did not include information on Intra-Entity Flows, which are applicable to the Entity.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that an Outsourcing Contractor without CoC Certification who takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing must be included in the Entity's CoC Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that the Entity shall maintain legal ownership or Control of all CoC Material handled by Outsourcing Contractors through outsourcing agreements or other mechanisms.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that any Outsourcing Contractor shall not further outsource any processing, treatment or manufacturing of CoC Material to any other contractor. These requirements shall be incorporated into the outsourcing agreement.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that any Outsourcing Contractor shall be

CRITERION	RATING	COMMENT
		regularly audited.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that the Outsourcing Contractor shall provide information on the Output Quantity of CoC Material and the Quantity of CoC Material returned to the Entity at the end of each month.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that the Quantity of CoC Material provided to the Outsourcing Contractor and the Quantity of CoC Material Output returned by the Outsourcing Contractor shall be verified and recorded in each Facility's Material Accounting System, either the New Century (NC) or SAP systems.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not currently have Outsourcing Contractors. The Entity has defined a CoC Outsourcing Contractor Management Procedure which stipulates that in the case of an error discovered after CoC Material is shipped to the Entity. The Outsourcing Contractor shall document the error and ensure that agreed steps are taken to correct it and implement actions to avoid recurrence.
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.
3.3b 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.

CRITERION	RATING	COMMENT
3.3a ASI Aluminium (CoC Certification Scope)	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)	Conformance	The Entity has systems in place to ensure that ASI Aluminium is produced only from the Aluminium Re-Melters that are within the Entity's CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity engages in Re-Melting and this activity is included in the Entity's ASI Performance Standard Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has developed and implemented its ASI CoC Recycled Aluminium Management Procedure which stipulates the eligibility criteria and a management program for Eligible Scrap and its suppliers. A Due Diligence process for vendors of Pre-Consumer Scrap is required to be carried out. A review of records confirmed the Due Diligence investigation was completed for the Pre-Consumer Eligible Scrap supplier and that the supplier holds an ASI CoC Certificate.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity has developed and implemented its ASI CoC Recycled Aluminium Management Procedure which stipulates the eligibility criteria and a management program for Eligible Scrap and its suppliers. A Due Diligence process for vendors of Post-Consumer Eligible Scrap is required to be carried out. A review of records confirmed the Due Diligence investigation was completed for Post-Consumer Eligible Scrap suppliers.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity, as they do not plan to purchase Eligible Scrap recovered from treated Aluminium Dross or recycled Aluminium from Aluminium ash or other Aluminium containing waste.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established its ASI Supplier Control Procedure and ASI Supplier Evaluation Management Control Procedure which define the recording requirements relating to the Entity's direct suppliers of Recyclable Scrap Material. The Audit confirmed that recorded information includes the supplier's identity, principles and places of operation. Records are completed in the ASI CoC Eligible Scrap supplier list.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity has established a Cash Payment Principle and an ASI CoC Management Manual which limit cash transactions to a maximum of US\$10,000. A document review confirmed that all financial transactions with direct suppliers of Recyclable Scrap Material are paid by bank transfer, and no cash transactions occur between the Entity and its suppliers.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Aluminium from Casthouses within their Facilities that are included in the Entity's CoC Certification Scope, specifically Shandong Innovation Precision Technology Co., Ltd., Inner Mongolia Innovation New Materials Co., Ltd. and Yunnan Innovation

CRITERION	RATING	COMMENT
		Alloy Co., Ltd. All ASI Aluminium Casthouse Products produced by the Entity are traceable to these Facilities in the Entity's Material Accounting System.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Aluminium at Casthouses that are within the Certification Scope of its ASI Performance Standard Certificate.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has implemented an ASI CoC Supplier Due Diligence Procedure which stipulates that the suppliers' CoC Certificate and Performance Standard Certificate shall be verified when ASI Aluminium is purchased from these suppliers. All suppliers must undergo a verification process. This Audit verified the Supplier Audit Forms that stated whether the supplier has obtained the required CoC Certificate. To date, there have been no actual CoC Material procurement transactions.
5.2 Unique Identification	Minor Non-Conformance	The Entity has implemented a Code with rules for Product management in each of the Entity's Facilities with a Casthouse. These rules define the requirement for a serial code for each batch of Product. For ASI CoC Material, only the Facilities that hold ASI CoC Certification shall implement the Input and Output statistics according to the incoming batch number for traceability in the NC system. However, one of the Entity's Facilities had not established the code rules for management of ASI Aluminium in its Enterprise Resource Planning (ERP) system.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces Post-Casthouse ASI Aluminium at the Shandong Innovation Precision Technology Co., Ltd. and Inner Mongolia Innovation Lightweight New Materials Co., Ltd. Facilities that are within its Chain of Custody Certification Scope. These Facilities are equipped with workshops and equipment such as slitting machines, homogenising machines, profile extruding line and Computerised Numerical Control (CNC) machines etc.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity and its Facilities that produce Post-Casthouse ASI Aluminium are Certified to the ASI Performance Standard.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity, as they only source ASI Aluminium from Re-Melting Facilities that are within its own Control and does not source ASI Aluminium for its Casthouses externally.
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 developed and implemented a Responsible Sourcing Policy addressing anti-Corruption, including the principle that the Entity shall 'oppose all forms of Corruption'. The Entity communicates its Responsible Sourcing Policy to its suppliers. The Policy is approved by the General Manager and is available on the Entity's website at: https://innovationmetal.com/d/file/p/2025/03-

CRITERION	RATING	COMMENT
		03/b5a8cb536a3cdb22c7d2fc22fda6038d.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has developed a Responsible Procurement Policy which is endorsed by the Group procurement director and addresses Environmental, Social and Governance (ESG) issues. This Policy covers the responsible sourcing of Aluminium; opposing all forms of Corruption; respecting Human Rights; and not supporting armed conflicts or Human Rights violations in Conflict-Affected and High-Risk Areas (CAHRAs). Whilst the Responsible Procurement Policy is not disclosed, the Entity has communicated its Responsible Sourcing Policy to its suppliers. The Audit confirmed that the Entity's suppliers received the Responsible Sourcing Policy combined with the procurement contracts. The Entity had provided opportunities for the review of the Responsible Procurement Policy and has established that the Policy will be reviewed upon business changes resulting in changes in significant ESG risks.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy with a commitment to Human Right Due Diligence on its official website at: https://innovationmetal.com/d/file/p/2025/03-03/b5a8cb536a3cdb22c7d2fc22fda6038d.pdf The Responsible Sourcing Policy was communicated to the Entity's suppliers. The Audit demonstrated that supplier Due Diligence has been conducted by the Entity.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has publicly disclosed its Responsible Sourcing Policy on its official website at: https://innovationmetal.com/d/file/p/2025/03-03/b5a8cb536a3cdb22c7d2fc22fda6038d.pdf The Entity has committed to not purchasing material from CAHRAs in the Responsible Sourcing Policy. The Entity has signed guarantee letters with its suppliers to avoid the use of conflict minerals.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established the ASI CoC Supplier Due Diligence Procedure that stipulates it shall assess the risks of non-compliance with its Responsible Sourcing Policy. The Entity's supplier survey covers non-compliance on environment, social and governance aspects.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established an accessible, transparent, understandable and culturally sensitive Complaints Resolution Mechanism. The complaints channel includes a telephone line which was tested during the Audit and found to be operational and effective. The Complaints Resolution Mechanism is available at: https://innovationmetal.com/d/file/p/2025/03-03/ed5ca30a3cd0c1a69cbf162e3b2ae424.pdf
8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure. The Entity's Facilities have installed NC or SAP ERP systems as the Material Accounting System that records Input Quantities and Output Quantities of COC Material and Eligible Scrap by mass. These ERP systems are able to account for and safeguard the CoC Material and

CRITERION	RATING	COMMENT
		Eligible Scrap Mass Balance within the Entity's Certification Scope. The Entity has conducted simulations to test the Material Accounting System and incorporated the results into the ERPs.
8.2 Material Accounting Period	Conformance	The Entity's Material Accounting System has defined that the Material Accounting Period is twelve months, based on a calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a procedure which defines that in a given Material Accounting Period, the Quantities of each CoC Material and Eligible Scrap Input and the Quantities of Non-CoC Material and Recyclable Scrap Material Inflow to the Certification Scope shall be recorded. The Inflow Quantity of Eligible Scrap and Recyclable Scrap Material shall be based on an assessment of the Aluminium content.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure to define the Output Quantity of CoC Material. The Entity has established a program of internal metal management, metal statistics and a metal balance of material management reports. The Entity's Facilities have installed NC or SAP systems to manage Input and Output Quantities, as well as the Entity's Statistical Management System and Methods of Calculating Statistical Indicators.
8.5 Indivisibility of CoC Material	Conformance	The Entity has established a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure to define the Output Quantity of CoC Material, which may be a subset of total production and shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity, as it has no Eligible Scrap Output. The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which establishes that if the Entity generates Scrap and wishes to designate the relevant proportion as Eligible Scrap, the Entity shall, for the given Material Accounting Period, use the same percentage share as for its Output of ASI Aluminium.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Facilities have implemented NC or SAP systems to ensure the total CoC Material Output does not proportionally exceed the Input Percentage as applied to total Input of CoC Material and/or Eligible Scrap over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which define that any Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which define how to carry over an Internal Overdraw to the subsequent Material Accounting Period (next calendar year), where that Quantity is subject to a Force Majeure situation. The Procedure defines that the Internal Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure situation.

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8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which define that the Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which define that a Positive Balance of CoC Material Output at the end of a Material Accounting Period may be carried over to the subsequent Material Accounting Period. The procedure defines that the Entity's Material Accounting System must clearly identify any carry over of a Positive Balance.
8.9b Positive Balance (Expiry)	Conformance	The Entity has implemented a Mass Balance System for CoC Materials and an ASI Aluminium Management Procedure which define that a Positive Balance of Output CoC Material at the end of a Material Accounting Period may be carried over to the subsequent Material Accounting Period. The Procedure further defines that 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.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall accompany each shipment of CoC Material dispatched to other CoC Certificated Entities.
9.2a CoC Document Content (Date of issue)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the date of issue. The Audit Team reviewed the CoC Document templates at each Facility and confirmed that the date of issue is included.
9.2b CoC Document Content (Reference number)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC document shall include the number of the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the number is included and is linked to the Entity's Material Accounting System.
9.2c CoC Document Content (Issuing Entity)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the identity, address and CoC Certification number of the Entity. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the identity, address and CoC Certification number of the Entity is included.
9.2d CoC Document Content (Receiving customer)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the identity and address of the customer receiving the CoC

CRITERION	RATING	COMMENT
		Material, and if it is another CoC Certified Entity, their CoC Certification number. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the identity and address of the customer receiving the CoC Material is included. Where the customer is another CoC Certified Entity, the templates also include their CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the signature of the responsible employee of the Entity who can verify information in the CoC Document. Each of the Entity's Facilities has appointed a supervisor responsible for verifying CoC Documents.
9.2f CoC Document Content (Conformance statement)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall be confirmed with the relevant statement. The CoC Document information is confirmed by a supervisor who will confirm that the information provided in the CoC Document is in Conformance with the ASI Chain of Custody Standard.
9.2g CoC Document Content (Type of CoC Material)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the type of CoC Material in the shipment. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the type of CoC Material in the shipment is included.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the mass of CoC Material in the shipment. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the mass of CoC Material in the shipment is included.
9.2i CoC Document Content (Mass of total material)	Conformance	Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define that a CoC Document shall include the mass of total material in the shipment. The Audit Team reviewed the CoC Document templates at each Facility and confirmed the mass of total material in the shipment is included.
9.3a Sustainability Data (optional) – Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity, as it has chosen not to include Sustainability Data in its CoC Documents. Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define the process for including such information, should the Entity decide to do so in the future.
9.3b Sustainability Data (optional) – Origin information	Not Applicable	This Criterion is not applicable to the Entity, as it has chosen not to include Sustainability Data in its CoC Documents. Each of the Entity's Facilities has established a CoC Documents Issue

CRITERION	RATING	COMMENT
		Management Procedure which define the process for including such information, should the Entity decide to do so in the future.
9.3c Sustainability Data (optional) – Recycled content	Not Applicable	This Criterion is not applicable to the Entity, as it has chosen not to include Sustainability Data in its CoC Documents. Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define the process for including such information, should the Entity decide to do so in the future.
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity as it has chosen not to include Sustainability Data in its CoC Documents. Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define the process for including such information, should the Entity decide to do so in the future.
9.4 Supplementary Information (optional) – Objective evidence	Not Applicable	This Criterion is not applicable to the Entity as it has chosen not to include Sustainability Data in its CoC Documents. Each of the Entity's Facilities has established a CoC Documents Issue Management Procedure which define the process for including such information, should the Entity decide to do so in the future.
9.5 Verification of Information	Conformance	The Entity has implemented a verification mechanism at each of its Facilities and has appointed several responsible employees to issue CoC Documents who shall respond to such reasonable requests to verify the information in CoC Documents issued by the Entity.
9.6 Error (Shipping)	Conformance	Each of the Entity's Facilities has established a procedure that defines the process to be followed if an error is discovered after a CoC Material shipment. Any errors identified by the Entity shall be promptly reported to the receiving business and remedied by both parties agreeing to the steps taken to correct it.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has implemented a procedure that stipulates that all required information in the received CoC Documents shall be verified on receipt.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	Each of the Entity's Facilities has established a CoC Documents Receipt Management Procedure which stipulate that the Business Departments shall verify the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System (NC or SAP systems).
10.3 Verification of Supplier's ASI CoC Certification	Conformance	Each of the Entity's Facilities has established a CoC Documents Receipt Management Procedure which stipulate that the Business Departments shall check the ASI website quarterly to verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap.
10.4 Error (Reception)	Conformance	Each of the Entity's Facilities has established a CoC Documents

CRITERION	RATING	COMMENT
		Receipt Management Procedure which define the process to be followed after discovery of an error in a CoC Material shipment. The corrective actions include the return of the shipment or voiding of the CoC Document. The Entity and the supplying party shall document the error and the agreed steps taken to correct it and implement actions to avoid a recurrence.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has implemented an ASI CoC Claims and Communication Management Procedure. The procedure stipulates that any claims and communications shall be made in a manner and form consistent with the ASI Claims Guide. The Entity has not made any external claim or communication about ASI CoC Certification to date.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has implemented an ASI CoC Claims and Communication Management Procedure. The procedure stipulates that any claims and communications shall be made in a manner and form consistent with the ASI Claims Guide. The Entity's Facilities have also established ASI CoC Claim and Communication programs in accordance with the Group procedure. The Entity has not made any external claim or communication about ASI CoC Certification to date.
11.1c Claims and Communications (Employee training)	Conformance	Interviews conducted confirmed that the relevant employees understand and can communicate ASI claims and representations following internal training. The Entity has not made any external claim or communication about ASI CoC Certification to date.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	15 October 2025	Initial Certification Audit – Full Certification