

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Kobe Steel, Ltd. Moka Works

CERTIFICATE NUMBER

379

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

ERM CERTIFICATION
AND VERIFICATION
SERVICES

DATE OF ISSUE

24 JUNE 2024

DATE OF EXPIRY

23 JUNE 2027

CERTIFIED SINCE

24 JUNE 2024

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.Aluminium-stewardship.org*

CERTIFICATION SCOPE

Manufacture of Aluminium
products at Moka Works located in
Tochigi, and the relevant corporate
functions at the Head Offices
located in Kobe and Tokyo, Japan.

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Kobe Steel, Ltd.
ENTITY NAME	Kobe Steel, Ltd. Moka Works
CERTIFICATION SCOPE	Manufacture of Aluminium products at Moka Works located in Tochigi, and the relevant corporate functions at the Head Offices located in Kobe and Tokyo, Japan.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-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 (17 – 19 April 2024)Surveillance Audit and Scope Change (4 – 12 March 2026)
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">17 – 19 April 2024 (Initial Certification Audit)4 – 12 March 2026 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 June 2024 (Initial Certification Audit)7 April 2026 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (17 – 19 April 2024)</u></p> <p>The Audit Scope includes the manufacture of Aluminium products at Moka Works, Tochigi, Japan.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit and Scope Change (4 – 12 March 2026)</u></p> <p>The Audit Scope includes the manufacture of Aluminium products at Moka Works, Tochigi, and the relevant corporate functions (General Affairs & CSR, Equipment & Materials Procurement, Environment & Safety Department, Human Resources) at the Kobe and Tokyo Head Offices, Japan. The Audit of the Head Office locations was conducted remotely.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse

All relevant Criteria in the ASI Performance 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.
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CERTIFICATION PERIOD 24 June 2024 – 23 June 2027

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 23 June 2027

CERTIFICATE NUMBER 379



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 Kobe Steel Group has annual sales of approximately 1.7 trillion yen. As the primary plant of the Steel and Aluminium Business Division, the Moka Works (the 'Entity') commenced operation in 1969 and is solely responsible for manufacturing Aluminium sheeting used in aeroplanes, Shinkansen trains, beverage cans, hard disk drives, automobiles and other applications. The Entity's rolling plant is considered one of the most efficient in the industry, with one of the highest production volumes of any such facility in Japan. The advanced rolling technology used by the Entity since the operation commenced has resulted in high-quality products which are lightweight, non-toxic, durable, and recyclable. The base material contains Primary Aluminium and various Scrap materials (recycled metal).

The Entity is located in the Moka-5 industrial park in Moka City, Tochigi Prefecture, Japan and currently has approximately 1,020 employees.

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 in the Production and Transformation class since May 2022. https://aluminium-stewardship.org/about-asi/members/Kobe-Steel-Ltd
1.2 CoC Management System	Conformance	The Entity has developed its CoC Management Manual and established a Management System which complies with the applicable requirements of the ASI Chain of Custody Standard for the facilities within its CoC Certification Scope.
1.3 CoC Management System Monitoring	Conformance	The Entity has established an annual review of its Chain of Custody Management System to ensure its suitability, adequateness, and effectiveness.
1.4 Management Representative	Conformance	The Entity has appointed the Moka Works General Manager as the Management Representative with overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI CoC Standard.
1.5 Communications and Training	Conformance	The Entity has communicated and trained relevant personnel in the planning department regarding the ASI CoC Standard to meet their assigned responsibilities under the Standard.
1.6 Records Management	Conformance	The Entity maintains up-to-date records that comply with all applicable requirements of the ASI CoC Standard and retains these for at least five years as required.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has not completed any transactions involving CoC Material to date. The Entity defines how to report information regarding CoC Materials to the ASI Secretariat in its CoC Accounting, Documentation, and Display Standards. The Entity's provision for annual reporting to the ASI Secretariat is documented in a procedure. Reporting includes the Input and Output Quantities of CoC Material to/from the Certified Entity over the calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity's provisions for annual reporting to the ASI Secretariat are documented in a procedure. Reporting includes Input and Output Quantities of Eligible Scrap to/from the Certified Entity over the calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity's provision for annual reporting to the ASI Secretariat is documented in a procedure. Reporting includes the Inflow and Outflow Quantities of Non-CoC Material/s to/from the Certified Entity over the calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's provision for annual reporting to the ASI Secretariat is documented in a procedure. Reporting includes the Positive Balance carried over to the subsequent Material Accounting Period, if any.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's provision for annual reporting to the ASI Secretariat is documented in a procedure. Reporting includes any Positive Balance used within the calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity's provisions for annual reporting to the ASI Secretariat is documented in a procedure. Reporting includes the Internal Overdraw within the calendar year, if any.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's provision for annual reporting to the ASI Secretariat is documented in a procedure. Reporting is designed to include the quantities of CoC Material/s transferred between supply chain activities within the Entity (Intra-Entity Flows) over the calendar year.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
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 it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors to process, treat or manufacture CoC Material.

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.

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

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The ASI Aluminium produced at Moka Works comes from its own recycling facilities, which are included in the ASI CoC Certification Scope, and from other can manufacturing companies.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity is certified against the ASI Performance Standard, certificate number 364, issued on 29 May 2024.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity defines Eligible Scrap only as Pre-Consumer Scrap with Chain of Custody documentation, according to its CoC Manual.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity defines Eligible Scrap only as Pre-Consumer Scrap (and not Post-Consumer) with Chain of Custody documentation, according to its CoC Manual.
4.2c Eligible Scrap (Dross)	Conformance	The Entity defines Eligible Scrap only as Pre-Consumer Scrap (and not Post-Consumer) with Chain of Custody documentation, according to its CoC Manual.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has implemented a Supplier Management System which identifies and records all Scrap suppliers, which is managed by the Raw Materials Procurement Department.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity's payments for Scrap purchases are made through bank transfer only, not cash. Suppliers and their transactions are registered in the Entity's internal system.

5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

CRITERION	RATING	COMMENT
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Casthouse operations, which produce ASI Aluminium, are included in the Moka Works ASI CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse operations, which produce ASI Aluminium, are included in the Moka Works ASI CoC Certification Scope. The Entity is certified against the ASI Performance Standard, certificate number 364, issued on 29 May 2024.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's method of accounting for ASI Aluminium is defined according to the ASI Chain of Custody Standard requirements.
5.2 Unique Identification	Conformance	The cast products at Moka Works are slabs which are identified by the slab number. In the post-casting process, they are identified by the coil number which is linked to the slab number. The association between coil numbers and CoC Materials is managed using the material accounting sheet specified in the CoC accounting, documentation, and display regulations.

6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Casthouse operations, which produce ASI Aluminium, are included in the Moka Works ASI CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse operations, which produce ASI Aluminium, are included in the Moka Works ASI CoC Certification Scope. The Entity is certified against the ASI Performance Standard, certificate number 364, issued on 29 May 2024.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity ensures that its Post-Casthouse Facility sources only ASI Aluminium originating from its Casthouse and other ASI CoC-Certified Entities, directly or via a Trader. When using a Trader, the Entity confirms that the source of the ASI Aluminium can be identified through a verified CoC Document.

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 communicates its CSR procurement Policy to its suppliers. This Policy includes Anti-Corruption requirements. https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-Policy_e.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity communicates its CSR procurement Policy to its suppliers. This Policy includes Responsible Sourcing requirements. https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-Policy_e.pdf
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity communicates the CSR procurement Policy to its suppliers. This Policy includes Human Rights Due Diligence requirements. https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-Policy_e.pdf

CRITERION	RATING	COMMENT
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity communicates the CSR procurement Policy to its suppliers. This Policy includes Conflict-Affected and High-Risk Areas requirements. https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-Policy_e.pdf
7.2 Risk Assessment and Mitigation	Conformance	The Entity conducts risk assessments based on its Procurement Policy. Since 2022, the Entity has been evaluating suppliers on corporate governance, Human Rights, Labour, environment, quality, information security, supply chain, and co-existence with local communities, using an initial survey based on GCNJ SAQ, which is followed up with a second survey on the suppliers' procurement Policy against major business partners.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a complaint resolution mechanism, which is available at the Entity's website: https://www.kobelco.co.jp/inq/form/index.php?m=Mailform&no=089

8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System in accordance with its CoC Accounting, Documentation, and Display Standards.
8.2 Material Accounting Period	Conformance	The Entity has defined a 12-month accounting period (January to December) in accordance with its CoC Accounting, Documentation, and Display Standards.
8.3 Input and Inflow Quantities	Conformance	The Entity has established the CoC Accounting, Documentation, and Display Standards that specifies how the Entity records Input and Inflow Quantities.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that defines that Input Quantities of each CoC Material are used to determine the available amount of CoC Material for Output by mass in proportion to the total Inflow of CoC and Non-CoC Material.
8.5 Indivisibility of CoC Material	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that the Output Quantity of CoC Material shall be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that the percentage of Scrap designated as Eligible Scrap will use the same percentage as ASI Aluminium production.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that total production of CoC Material and/or Eligible Scrap shall not proportionately exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that Internal Overdraws shall not exceed 20%.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that Internal Overdraws shall be controlled below the amount of CoC Material affected by any Force Majeure event.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards that Internal Overdraws are to be settled within the next Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards how to identify a Positive Balance on the material accounting sheet.
8.9b Positive Balance (Expiry)	Conformance	The Entity has specified within its CoC Accounting, Documentation, and Display Standards how to identify and expire a Positive Balance on the material accounting sheet.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity has developed documentation and templates to track CoC Material Inputs and Outputs. To record the shipment or transfer of CoC Material, the Entity uses an email, which also includes the production number.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's CoC Document template includes the issue date.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's CoC Document template includes a reference number for the CoC Document linked to the Entity's Material Accounting System for verification purposes.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Document template includes the Entity's address, identity and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's CoC Document template includes the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, its CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's CoC Document template includes the name of the employee responsible for verifying the CoC document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's CoC Document template 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's CoC Document template includes the type of CoC Material in the shipment.

CRITERION	RATING	COMMENT
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's CoC Document template includes the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's CoC Document template includes the total mass of the CoC Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	If requested by the client, the Entity provides relevant information on the carbon footprint of the CoC Material.
9.3b Sustainability Data (optional) - Origin information	Conformance	If requested by the client, the Entity provides information on the origin of the Material.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity provides recycled content data upon the client's request.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity provides clients upon request with information on Post-Casthouse activities, including the ASI Performance Standard Certification Status.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	Upon client request, the Entity provides relevant information on Objective evidence.
9.5 Verification of Information	Conformance	The responsibilities and processes for responding to verification requests are documented in the Entity's CoC Accounting, Documentation, and Display Standards.
9.6 Error (Shipping)	Conformance	The Entity has a process for recording errors, analysing root causes, and undertaking relevant corrective actions to prevent any recurrence.

10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has established a procedure that defines the responsibility and process for verifying information within the CoC Document.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that define the responsibilities and processes for verifying the consistency of received CoC Documents.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that define the responsibilities and processes for verifying the supplier's CoC Certification status.
10.4 Error (Reception)	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that define the process for recording errors,

CRITERION	RATING	COMMENT
		analysing root causes, and taking relevant corrective actions to prevent recurrence.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has established a system to ensure that any claims and/or representations on CoC Material outside of CoC Documents are consistent with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that requires verifiable evidence is prepared to support any claims and/or representations made.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has established its CoC Accounting, Documentation, and Display Standards that requires relevant employees receive training regarding claims and communications on CoC Material.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 June 2024	Initial Certification Audit – Full Certification
1	26 May 2026	Surveillance Audit and Scope Change Scope Change to include the relevant departments at the Kobe and Tokyo Head Offices. Correction to the statement for Criteria 2.1-2.5 in Rev 0.