

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

HYDRO BAUXITE & ALUMINA

CERTIFICATE
NUMBER

29

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

29 MAY 2022

DATE OF EXPIRY

28 MAY 2025

CERTIFIED SINCE

29 MAY 2019

AUTHORISED BY

A handwritten signature in white 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

Hydro Bauxite & Alumina including the
Paragominas Bauxite Mine (Brazil), Alunorte
Alumina Refinery (Brazil), Bauxite & Alumina
Commercial Office (Switzerland) and the Hydro
Corporate Office (Norway).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Bauxite & Alumina
CERTIFICATION SCOPE	Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), Alunorte Alumina Refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and the Hydro Corporate Office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (26 – 29 November, 7 February 2019 and 15 March 2019)• Surveillance Audit (15 October – 13 November 2020)• Re-Certification Audit (14 – 18 February 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 26 – 29 November, 7 February 2019 and 15 March 2019 (Certification Audit)• 15 October – 13 November 2020 (Surveillance Audit)• 14 – 18 February 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 24 April 2019 (Certification Audit)• 21 January 2021 (Surveillance Audit)• 27 May 2022 (Re-Certification Audit)

AUDIT SCOPE

Certification Audit (26 – 29 November, 7 February 2019 and 15 March 2019):

The audit scope covered Hydro Bauxite & Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining

All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.

Surveillance Audit (15 October – 13 November 2020):

The audit scope covered Hydro Bauxite & Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.

At the time of the audit (October – November 2020), access to the sites was not possible due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification Audit (14 – 18 February 2022)

The audit scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining

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.
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- 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	29 May 2022 – 28 May 2025
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DUE DATE	28 May 2025
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CERTIFICATE NUMBER	29
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Bauxite Mining and Alumina Refining category and has held certification on the ASI Performance Standard and ASI Chain of Custody Standard since 2019.
1.2 Management system	Conformance	The Entity has developed a Management System for handling ASI Material and use of ASI logo. A Management System documentation procedure is developed. The procedure describes objectives, scope, responsibilities and the general system and workflow which gives governance of the CoC system.
1.3 Management system reviews	Conformance	The Entity has established procedures and processes to comply with requirements for the periodic review of the Management System and associated updates as required. An annual review is incorporated into the regular Management Review process. The most recent internal review was finalized and reported in June 2021.
1.4 Management representative	Conformance	The Entity has appointed the Marketing Manager as the responsible person for implementation and conformance with the requirements in the ASI Chain of Custody Standard. A nominated team, the Normative Committee, is responsible for the continuous management of the ASI certification system.
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard. Adequate training is performed.
1.6 Record keeping	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity's Standard Operating Procedures define the retention time as required.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity's operating procedure specifies that the Entity will report Input and Output Quantities of CoC Material to the ASI Secretariat within three months after the end of each calendar year. The most recent report was submitted in March 2021.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity's operating procedure specifies that the Entity will report Input Percentage to the ASI Secretariat within three months after the end of each

CRITERION	RATING	COMMENT
		calendar year. The most recent report was submitted in March 2021.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's operating procedure specifies that the Entity will report any Positive Balance to the ASI Secretariat within three months after the end of each calendar year. The most recent report was submitted in March 2021 with a Positive Balance of Alumina.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity's operating procedure specifies that the Entity will report any Internal Overdraw to the ASI Secretariat within three months after the end of each calendar year. The most recent report was submitted in March 2021 with no Internal Overdraw.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity does not engage in Aluminium Remelting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI Market Credits System.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.3 Output Quantity	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.4 Verification and record-keeping	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
2.5 Error management	Not Applicable	The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope - Bauxite Mining	Conformance	The Entity is engaged in Bauxite Mining and is part of the Entity's Certification Scope for Chain of Custody Certification

CRITERION	RATING	COMMENT
3.1b ASI Performance Standard - Bauxite Mining	Conformance	The Entity is engaged in Bauxite Mining and holds both ASI Performance Standard and Chain of Custody Certification.
3.2a CoC Certification Scope - Alumina Refining	Conformance	The Entity is engaged in Alumina Refining and is part of the Entity's Certification Scope for both Chain of Custody and Performance Standard Certification.
3.2b ASI Performance Standard - Alumina Refining	Conformance	The Entity is engaged in Alumina Refining and holds an ASI Performance Standard Certification.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.1c Sourcing ASI Aluminium	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has established a Supplier Code of Conduct addressing Anti-Corruption. The Code is mandatorily signed by Suppliers: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established a Supplier Code of Conduct addressing Responsible Sourcing. The Code is mandatorily signed by Suppliers and a due diligence risk assessment is undertaken prior to commencing business with the Entity: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established a Supplier Code of Conduct addressing Human Rights Due Diligence. The Code is mandatorily signed by Suppliers and a due diligence risk assessment is undertaken prior to commencing business with the Entity: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has established a Supplier Responsible Sourcing framework including assessment of Conflict Affected and High Risk Areas. The Supplier Code of Conduct is mandatorily signed by Suppliers and a due diligence risk assessment is undertaken prior to commencing business with the Entity: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf
7.2 Risk assessment	Conformance	The Entity has established a Supplier Code of Conduct including a Risk Assessment and qualification process. The Code is mandatorily signed by Suppliers and a due diligence risk assessment is undertaken prior to commencing business with the Entity.
7.3 Complaints mechanism	Conformance	The Entity has established a complaints mechanism allowing to raise concerns through different channels, such as the company website or email: https://www.hydro.com/en/contact-us Compliance@hydro.com

CRITERION	RATING	COMMENT
		The Alunorte site also holds a valid SA8000 certificate.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System developed to govern and report on Input Quantity as well as Output Quantity of CoC Material and Non-CoC Material, by mass. The accounting system is well implemented and has been operational since 2019.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Entity uses the period January to December as the Material Accounting Period.
8.4 Input Percentage	Conformance	The Entity's Material Accounting System calculates the Input Percentage in line with the requirement.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Entity's Material Accounting System calculates the Output Quantity by mass in line with the requirement.
8.7 Output Quantity designation	Conformance	The Entity's Output Quantity of CoC Material is designated as 100%. The Material Accounting System is designed to control this and the necessary training has been given.
8.8 Output Quantity - Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as there is no Pre-Consumer Scrap produced.
8.9 Outputs not exceed Inputs	Conformance	The Entity's Material Accounting System and internal control mechanisms assure that Outputs do not exceed Inputs.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established procedures and systems to control the Material Accounting Period and make sure Internal Overdraws do not exceed 20%.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System and internal control mechanisms assure the Internal Overdraw

CRITERION	RATING	COMMENT
		does not exceed the amount of CoC Material affected by a force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System and internal control mechanisms assure the Internal Overdraw is made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System and internal control mechanisms assures a Positive Balance is carried over to the subsequent Material Accounting Period.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System and internal control mechanisms assures that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material.
9.2a Date of issue	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the date of issue.
9.2b Reference number	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information including a reference number and material code.
9.2c Issuing Entity	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the issuing Entity.
9.2d Receiving customer	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the receiving customer.
9.2e Responsible employee	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the issuing Entity and the responsible employees who can verify information in the CoC Document.
9.2f Conformance statement	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material which includes a statement of conformance related to the ASI Chain of Custody Standard.

CRITERION	RATING	COMMENT
9.2g Type of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the type of CoC Material shipped.
9.2h Mass of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC material with information on the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the mass of total Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3c Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional)	Not Applicable	The Entity is not planning to add Supplementary Information.
9.5 Response to verification requests	Conformance	The Entity co-operates closely with clients that purchase CoC Material. Reports are issued on a regular basis and can support any request for further verification of information if needed.
9.6 Error management	Conformance	The Entity has developed an Error Management Procedure.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has a management system procedure and established routines to regularly check and verify received CoC Documents.
10.2 Verify consistency with shipments	Conformance	The Entity has a management system procedure and established routines to regularly check the consistency of CoC Documents before recording information in the Material Accounting System.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has a management system procedure and established routines to regularly check the ASI website to verify validity and scope of supplier's ASI CoC Certification Status.
10.4 Error management	Conformance	The Entity has developed an Error Management procedure to respond to the discovery of an error in shipping of CoC Material.

CRITERION	RATING	COMMENT
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System - allocation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1c No double counting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1d No Positive Balance of ASI Credits	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2a Date of issue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2b Reference number	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2g Quantity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3a CoC Certification Scope - purchasing ASI Credits	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3b Material Accounting System - purchasing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3c Expiry	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3d No re-trading	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3g Five year maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity's claims and/or representations for CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is undertaken in a manner and form consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity's claims and/or representations for CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is undertaken in a manner and form consistent with the ASI Claims Guide and is supported by verifiable evidence.
12.1c Employee training	Conformance	The Entity's claims and/or representations for CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is undertaken in a manner and form consistent with the ASI Claims Guide. Training for key personnel has been undertaken accordingly.

Document Control and Version History

Revision	Date	Notes
0	29 May 2019	Issued (Full Certification)
1	1 February 2021	Surveillance Audit
2	10 June 2021	Correction to Public Headline Statement for Criteria in Section 11
3	15 June 2022	Re-Certification Audit