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# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD

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PRESENTED TO

# ALUMINERIE ALOUETTE INC.

CERTIFICATE  
NUMBER

219

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

BNQ

DATE OF ISSUE

1 SEPTEMBER 2022

DATE OF EXPIRY

31 AUGUST 2025

CERTIFIED SINCE

1 SEPTEMBER 2022

AUTHORISED BY

A handwritten signature in white ink on a dark grey background. The signature is stylized and appears to be 'J. H.' followed by a long 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](http://www.aluminium-stewardship.org)**

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CERTIFICATION SCOPE

Aluminium smelter, casthouse and operational  
activities conducted at Alouette facilities in  
Canada.

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

MEMBER NAME	Aluminerie Alouette
ENTITY NAME	ALUMINERIE ALOUETTE INC.
CERTIFICATION SCOPE	Aluminium smelter, casthouse and operational activities conducted at Alouette facilities in Canada.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none"><li>Certification Audit</li></ul>
AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none"><li>20 – 21 October 2021</li></ul>
AUDIT SCOPE	<p>The Audit Scope for Aluminerie Alouette Inc. includes operations, maintenance and services required for the production of primary aluminium in facilities located in Canada.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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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      1 September 2022 – 31 August 2025

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NEXT AUDIT TYPE              Surveillance Audit

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NEXT AUDIT DATE              1 March 2024

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CERTIFICATION NUMBER      219

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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 Product and Transformation Member and is committed to complying with ASI's membership obligations and the ASI Complaints Mechanism. Aluminerie Alouette Inc. (AAI: the Entity) has been an ASI member since May 2019. <a href="https://aluminium-stewardship.org/about-asi/asi-members/aluminerie-alouette/">https://aluminium-stewardship.org/about-asi/asi-members/aluminerie-alouette/</a>
1.2 Management system	Conformance	The Entity has implemented a Management System and procedures that address all applicable requirements of the ASI Chain of Custody (CoC) Standard for all facilities under its control related to the management of the CoC Material. The Entity has provided adequate resources to maintain the effectiveness of its Management System and Material Accounting System.
1.3 Management system reviews	Conformance	The Entity ensures that the Management System is periodically reviewed at least annually and is updated. The Entity encourages staff to be involved in Management System improvements, revision, and activities.
1.4 Management representative	Conformance	The Entity has nominated Management Representatives to have overall responsibility and authority for the Entity's conformance with the ASI Chain of Custody Standard. A team is responsible for supporting the continuous management of the ASI Management System regarding Health, Safety and Environment (HSE).
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures to ensure relevant personnel are aware of and competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Record keeping	Conformance	The Entity has maintained up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity has developed standard operating procedures that define the retention time and systems use.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion does not apply to an initial Certification Audit, as no CoC data are yet available for reporting.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.

CRITERION	RATING	COMMENT
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		
3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	The Entity as a single site is engaged in Aluminium Smelting at Sept-Iles, Quebec, Canada. Aluminium Smelting activities are ASI Performance Standard Certified and are within the Entity's CoC Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	The Entity's Aluminium Smelter is ASI Performance Standard Certified, and its smelting activities are included within the Entity's CoC Certification Scope. <a href="https://aluminium-stewardship.org/wp-content/uploads/2020/07/ASI-Summary-Audit-Report-Aluminerie-Alouette-85-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2020/07/ASI-Summary-Audit-Report-Aluminerie-Alouette-85-PS.pdf</a>
<b>4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL</b>		
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.
<b>5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity's Casthouse is located within its Aluminium smelter site and produces Casthouse products (sows) from Primary Aluminium and are

CRITERION	RATING	COMMENT
		included within the Entity's CoC Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity's Casthouse is located within its Aluminium smelter site and holds a valid ASI Performance Standard certificate and is included within the Entity's CoC Certification Scope. <a href="https://aluminium-stewardship.org/wp-content/uploads/2020/07/ASI-Summary-Audit-Report-Aluminerie-Alouette-85-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2020/07/ASI-Summary-Audit-Report-Aluminerie-Alouette-85-PS.pdf</a>
5.2 Casthouse Products	Conformance	The Entity has established a Material Accounting System that allows for the traceability of material and provides full traceability through product identification (i.e., each sow has a unique identification number) on all shipments and deliveries from the Casthouse.
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.
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)	Minor Non-Conformance	The Entity sources 100% of the received or planned Alumina supply from ASI-CoC Certified suppliers for 2021-2022. The supply is managed by AAI Shareholders through the AAI Alumina Committee (AC) which oversees the Due Diligence process for any eventual non-ASI Certified Alumina supplies. In case of force majeure affecting the Alumina supply chain, it may be required to source from other non-ASI-certified Alumina suppliers to maintain smelter production.  However, it was identified the Entity did not deploy its Responsible Sourcing Policy nor distributed it throughout the Alumina Committee Due Diligence process for Alumina suppliers.
7.1b Responsible sourcing policy (responsible sourcing)	Minor Non-Conformance	It was identified the Entity did not deploy or utilise its Responsible Sourcing Policy nor distributed it throughout the Alumina Committee Due Diligence process for Alumina suppliers.

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Minor Non-Conformance	It was identified the Entity did not deploy or utilise its Responsible Sourcing Policy nor distributed it throughout the Alumina Committee Due Diligence process for Alumina suppliers.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Minor Non-Conformance	It was identified the Entity did not deploy or utilise its Responsible Sourcing Policy nor distributed it throughout the Alumina Committee Due Diligence process for Alumina suppliers.
7.2 Risk assessment	Minor Non-Conformance	It was identified the Entity did not implement the Alumina Committee Due Diligence process and is unable to demonstrate: <ul style="list-style-type: none"> <li>the assessment of Non-Compliance risk of Non-ASI Certified Alumina suppliers with the Responsible Sourcing Policy</li> <li>any documentation of findings from these risk analyses and,</li> <li>the implementation of measurable risk mitigation plans (if applicable and required).</li> </ul>
7.3 Complaints mechanism	Conformance	The Entity has established complaint mechanisms allowing concerns to be raised through different channels. The two major mechanisms are through the website ( <a href="https://www.alouette.com/en/our-commitment/whistleblower-line">https://www.alouette.com/en/our-commitment/whistleblower-line</a> ) and via email ( <a href="mailto:communications@alouette.qc.ca">communications@alouette.qc.ca</a> ). An external firm manages the anonymous complaints received via the website and they are forwarded to the Human Resources Vice President.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System to govern and report on the Input/Output Quantity of CoC and Non-CoC Material.
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 has defined a Material Accounting Period of 12 months accounting period from January to December.
8.4 Input Percentage	Conformance	The Entity calculates the Input Percentage for its Mass Balance System using the following method:



CRITERION	RATING	COMMENT
		the Input Percentage is 0% or 100% of certified content for each received Alumina. One hundred percent certified content received shipments are compiled by mass in a matrix and the 0% certified content received shipments are compiled by mass in another matrix. This approach allows the Entity to manage and allocate Output quantities as ASI CoC Certified.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Input Percentage (0% or 100%) is calculated by year according to the Material Account period (January to December).
8.7 Output Quantity designation	Conformance	100% of certified content received shipments are compiled by mass in the certified material matrix within the Material Accounting System The 0% certified content received shipments are compiled by mass in the Non-CoC Certified Material matrix of the Material Accounting System. This approach allows the Entity to manage and allocate the ASI CoC status to the Output quantities that will be 100% CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.9 Outputs not exceed inputs	Conformance	The Entity has established a Material Accounting system and internal control mechanisms to ensure that Outputs do not Exceed Inputs. An external accounting firm oversees the global mass balance calculations as part of financial audits.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established procedures and systems to control its Material Accounting and make sure that Internal Overdraws do not exceed 20 %.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity established internal control mechanisms to ensure that Internal Overdraws do 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 ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's implemented Material Accounting System and internal control mechanisms ensure

CRITERION	RATING	COMMENT
		that a Positive Balance is carried over to the subsequent Material Accounting Period and any carryover will be identified.
8.11b Positive Balance (expiry)	Conformance	The Entity's implemented Material Accounting System and internal control mechanisms ensure a Positive Balance is carried over to the subsequent Material Accounting Period and will expire at the end of that period if not drawn down.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has established a CoC process that covers the required document for shipments or statements of materials. The CoC document is prepared from a standard template.
9.2a Date of issue	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes a Date of issue.
9.2b Reference number	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes a Reference number.
9.2c Issuing Entity	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes details on the Issuing Entity.
9.2d Receiving customer	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes details on the Receiving customer.
9.2e Responsible employee	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes details of the Responsible employee.
9.2f Conformance statement	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes a statement of conformance.
9.2g Type of CoC Material	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material including the type of material.

CRITERION	RATING	COMMENT
9.2h Mass of CoC Material	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes the mass of CoC material.
9.2i Mass of total material	Conformance	The Entity has demonstrated the use of the template 'ASI CoC Expedition Document' and how it is shipped with ASI CoC Material which includes the mass of total material.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Sustainability Data regarding Greenhouse (GHG) Emissions in the CoC Document.
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	This Criterion is not applicable as the Entity does not intend to include Supplementary Information in the CoC Document.
9.5 Response to verification requests	Conformance	The Entity has established a CoC process that includes the possibility to respond to clients' requests regarding the information presented in CoC documents and manages the communications with customers with the support of the Alumina Committee.
9.6 Error management	Conformance	The Entity has established a corrective action management procedure and CoC process which has a provision to manage, document and correct shipping errors (if any) in agreement with the receiving party.
<b>10 RECEIVING COC DOCUMENTS</b>		
10.1 Verify required information included	Minor Non-Conformance	100% of the received or planned Alumina supply comes from ASI CoC certified suppliers for 2021-2022 and was managed by the Entity's Alumina Committee (AC). The Entity has developed a Management System procedure and established routines to regularly check the consistency of the CoC Documents before recording the required information in the Material Accounting System. However, it was identified that the Entity was unable to provide the corresponding receiving documents from ASI CoC Certified Alumina suppliers to demonstrate if the transferred Alumina

CRITERION	RATING	COMMENT
		through the Alumina Committee (AC) and to the Entity was ASI certified (e.g., the transfer of the ASI CoC Material through the certified suppliers' shipping documents could not be verified).
10.2 Verify consistency with shipments	Conformance	The Entity has implemented a Management System procedure and established routines to regularly verify the consistency of received documents before recording information in the Material Accounting System.
10.3 Verify supplier CoC Certification status	Minor Non-Conformance	It was identified that the Entity (via the AC) could not demonstrate the frequency of checks it makes on the ASI website to verify the validity and scope of the supplier's ASI CoC Certification.
10.4 Error management	Conformance	The Entity has established a CoC process including a corrective action management Procedure to manage, document and correct received shipping errors (if any) in agreement with the supplying party.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

## 12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has developed a claims and communication procedure to be followed if claims are made. The procedure follows the principles of the ASI Claim Guide.
12.1b Verifiable evidence	Conformance	The Entity has developed a procedure for claims and follows the principles of the ASI Claim Guide. The Entity's ASI Management System and Material Accounting System enable the verification of verifiable evidence.
12.1c Employee training	Conformance	The Entity has developed a declaration guide related to ASI claims, declarations, or communications. The Entity provides appropriate training to targeted employees related to claims, representation, or communications.

### Document Control and Version History

Revision	Date	Notes
0	1 September 2022	Initial Certification Audit - Full Certification