
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

HYDRO ALUMINIUM ROLLED PRODUCTS

CERTIFICATE
NUMBER

28

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

6 MAY 2019

DATE OF EXPIRY

5 MAY 2022

CERTIFIED SINCE

6 MAY 2019

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark grey background.

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CERTIFICATION SCOPE

Hydro Aluminium Rolled Products Chain of Custody certification includes sites Grevenbroich, Hamburg, and Neuss (Germany), the joint venture site Alunorf (Germany) and outsourcing contractors that handle CoC Material.

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

SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME Hydro

ENTITY NAME Hydro Aluminium Rolled Products

CERTIFICATION SCOPE Hydro Aluminium Rolled Products Chain of Custody certification includes sites Grevenbroich, Hamburg, and Neuss (Germany), the joint venture site Alunorf (Germany) and outsourcing contractors that handle CoC Material.

SUPPLY CHAIN ACTIVITIES

- Aluminium Smelting
- Aluminium Re-melting / Refining
- Casthouses
- Post-Casthouses

ASI STANDARD

- Chain of Custody Standard V1

AUDIT TYPE

- Certification Audit

AUDIT FIRM DNV GL

AUDIT DATE 10 October 2018 – 18 February 2019

AUDIT REPORT SUBMISSION 24 April 2019

AUDIT SCOPE The audit scope covered the Hydro Aluminium Rolled Products CoC Certification scope includes Grevenbroich, Hamburg, Neuss and JV partner Alunorf. The scope also includes all outsourced contractors, that handle the Entity's CoC Material.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting / Refining
- Casthouses
- Post-casthouse

Relevant criteria from 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

6 May 2019 – 5 May 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

3 November 2020

CERTIFICATION
NUMBER

28

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 Production and Transformation category and holds certification to the Performance Standard as well.
1.2 Management system	Conformance	The Entity has created a management system for handling ASI Material and use of ASI logos. A Management System Documentation Procedure is developed. The procedure describes purpose, 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 ASI CoC criteria regarding the periodic review of the management system and associated updates as required. A yearly review following the regular Management Review process is established.
1.4 Management representative	Conformance	The Entity has appointed the HSSE Manager as the responsible person for ASI CoC Standard implementation and conformance with the requirements in the standard.
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 CoC Standard. Adequate training has been carried out.
1.6 Record keeping	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the CoC Standard. The Entity's standard operating procedures defines the retention time as required by the ASI CoC Standard.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	The Entity's operating procedure specified that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	The Entity's operating procedure specified that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Not Applicable	The Entity's operating procedure specified that it will report any Positive Balance to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	The Entity's operating procedure specified that the Entity will report any Internal Overdraw to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity's operating procedure specifies that it will report on total input quantities of eligible scrap to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity will not engage in purchasing/selling credits.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity will not engage in purchasing/selling credits.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Conformance	The Entity has identified all applicable Outsourced Contractors in their Certification Scope.
2.2a Control of CoC Material	Conformance	The Entity has established procedures and tools to govern and control ownership of CoC Material used by outsourcing partners.
2.2b No further outsourcing	Conformance	The Entity has established procedures and governance to follow up and make sure Outsourcing Contractors are not using any other contractors to perform work on CoC Material.
2.2c Risk assessment	Conformance	The Entity has established procedures and governance to follow Outsourcing Contractors regularly and during qualification processes risks are assessed and addressed.
2.3 Output Quantity	Conformance	The Entity has established procedures and systems to regularly gather output quantity of CoC Material from Outsourcing Contractors. As there has been no sourcing and transfer of CoC Material, this will be assessed at the next surveillance audit.
2.4 Verification and record-keeping	Conformance	The Entity has established procedures and system to track and verify the consistency between output and input quantity of CoC Material to the Outsourcing Contractors. As there has been no

CRITERION	RATING	COMMENT
		sourcing and transfer of CoC Material, this will be assessed at the next surveillance audit.
2.5 Error management	Conformance	The Entity has developed an error management procedure. As there has been no sourcing and transfer of CoC Material, this will be assessed at the next surveillance audit.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	The Entity is not involved in Bauxite Mining.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	The Entity is not involved in Bauxite Mining.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	The Entity is not involved in Alumina Refining.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	The Entity is not involved in Alumina Refining.
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	The Entity is engaged in Aluminium Smelting and holds an ASI Performance Standard certification.
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	The Entity is engaged in Aluminium Smelting and holds an ASI Performance Standard certification.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-melting/refining to produce recycled Aluminium. The production sites are inside the scope of the CoC Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-melting/refining to produce recycled Aluminium. The production sites are inside the scope of the CoC certification scope and certified against the ASI Performance Standard.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has procedures and policies stating that it will only use certified material for re-melting/refining to complement the annual output of ASI material.
4.2b Post-Consumer Scrap	Conformance	The Entity has established procedures and accounting system to govern the qualification of eligible post-consumer scrap. Due diligence processes are in place for qualifying and follow up on scrap suppliers.

CRITERION	RATING	COMMENT
4.3a Supplier records	Conformance	The Entity has an accounting system to identify, principals and place/s of operation of all direct suppliers of Recyclable Scrap Material.
4.3b Cash payments	Not Applicable	Not applicable as no cash payments are made.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity is producing Casthouse products from primary aluminium and recycled aluminium. These sites are inside the Entity's Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity is producing Casthouse products from primary aluminium and recycled aluminium. These sites are all ASI Performance Standard certified.
5.2 Casthouse Products	Conformance	The Entity has an accounting system to link and trace the input quantity of CoC Material.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity Post-Casthouse facilities are inside the scope of the CoC certification.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity Post-Casthouse facilities are all ASI Performance Standard certified.
6.1c Sourcing ASI Aluminium	Conformance	The Entity sourcing policy guarantees that it will only be using aluminium from certified facilities.
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 of conduct is mandatory to be signed by suppliers. https://www.hydro.com/globalassets/08-about-hydro/our-business/hydro-supplier-code-of-conduct.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established a supplier responsible sourcing framework. The code of conduct is mandatory to be signed by suppliers. https://www.hydro.com/globalassets/08-about-hydro/our-business/hydro-supplier-code-of-conduct.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 of conduct is mandatory to be signed by

CRITERION	RATING	COMMENT
		<p>suppliers and due diligence is always applied prior to starting business with the Entity.</p> <p>https://www.hydro.com/globalassets/08-about-hydro/our-business/hydro-supplier-code-of-conduct.pdf</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has established a supplier responsible sourcing framework including assessment of conflict affected and high risk areas. The code of conduct is mandatory to be signed by suppliers and due diligence risk assessment is always conducted prior to starting business with the Entity.</p> <p>https://www.hydro.com/globalassets/08-about-hydro/our-business/hydro-supplier-code-of-conduct.pdf</p>
7.2 Risk assessment	Conformance	<p>The Entity has established a supplier code of conduct including a risk-assessment and qualification process. The code of conduct is mandatory to be signed by suppliers and a due-diligence risk assessment is always conducted prior to starting business with the Entity.</p>
7.3 Complaints mechanism	Conformance	<p>The Entity has established complaint mechanisms to raise concerns through different channels, such as the company website:</p> <p>https://www.hydro.com/en/contact-us or email: Compliance@hydro.com</p>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>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.</p>
8.2a Post-Consumer Scrap	Conformance	<p>The Entity has a Material Accounting System developed to govern and report on input quantity of Post-Consumer Scrap.</p>
8.2b Pre-Consumer Scrap (total)	Conformance	<p>The Entity has a Material Accounting System developed to govern and report on input quantity of Pre-Consumer Scrap.</p>
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	<p>The Entity has a Material Accounting System developed to govern and report on input quantity of pre-consumer scrap delivering both CoC Material and Non-CoC Material.</p>

CRITERION	RATING	COMMENT
8.3 Material Accounting Period	Conformance	The Entity has decided to use the period from January to December as their accounting period. This is in line with the requirement in the Standard.
8.4 Input Percentage	Conformance	The Entity's Material Accounting System calculates the input percentage in line with the requirements in the Standard.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity's Material Accounting System calculates the input percentage regarding re-melting/refining in line with the requirements in the Standard.
8.6 Output Quantity determination	Conformance	The Entity's Material Accounting System calculates the output quantity by mass in line with the requirements in the Standard.
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 in the organisation has been given.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity's Material Accounting System calculates the output quantity from internal eligible pre-consumer scrap in line with the requirements in the Standard.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System and internal control mechanisms will ensure that outputs do not exceed inputs, in line with the requirements in the Standard.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established procedures and systems to control the material accounting and make sure that 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 will ensure that Internal Overdraw 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 will ensure that Internal Overdraw will be 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 will assure that 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 will ensure that a positive

CRITERION	RATING	COMMENT
		balance which is carried over to the subsequent material accounting period 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 developed documents and records to follow shipments and transfer of CoC Material. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2a Date of issue	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on issue date. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2b Reference number	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on reference number and material code. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2c Issuing Entity	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on issuing entity. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2d Receiving customer	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on receiving customer. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.2e Responsible employee	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the responsible employee of the Entity who can verify information in the CoC Document. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.

CRITERION	RATING	COMMENT
9.2f Conformance statement	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on a statement of conformance related to ASI requirements. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
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 type of CoC Material shipped. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
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 mass of CoC Material in the shipment. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
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 mass of total material in the shipment. As there has been no sourcing and transfer of CoC Material, the effectiveness of these documents and records will be assessed at the next surveillance audit.
9.3a Sustainability Data (optional)	Conformance	The Entity will provide sustainability data upon request by customer such as GHG (greenhouse) data.
9.3b Sustainability Data (passing on)	Conformance	The Entity will upon request by customers provide Sustainability data if available.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity will upon request by customers provide data about Post-Casthouse ASI Certification status, as appropriate.
9.4 Supplementary Information (optional)	Conformance	The Entity will upon request by customer provide Supplementary Information as appropriate.
9.5 Response to verification requests	Conformance	The Entity has close cooperation with client buying CoC Material, will report on a regular basis and will support if further requests for verification of information arise.

CRITERION	RATING	COMMENT
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 receiving documents.
10.2 Verify consistency with shipments	Conformance	The Entity has a Management System procedure and established routines to regularly check the consistency of the CoC Documents before recording information in the 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 certification.
10.4 Error management	Conformance	The Entity has developed an error management procedure.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.1c No double counting	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2a Date of issue	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2b Reference number	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2c Issuing Entity	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2d Receiving Entity	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2e Conformance statement	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.2f ASI Credits statement	Not Applicable	The Entity will not be engaging ASI Market Credit System.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3c Expiry	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3d No re-trading	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3e No allocation to physical products	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	The Entity will not be engaging ASI Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	The Entity will not be engaging ASI 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 when or if they make any claims. The procedure is structured and follows the principles in the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has developed a claims and communication procedure to be followed when or if they make any claims. The procedure is structured and follows the principles in the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity has developed a claims and communication procedure to be followed when or if they make any claims. The procedure is structured and follows the principles in the ASI Claims Guide, also including training instructions.