

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ALERIS ALUMINUM DUFFEL BV

CERTIFICATE
NUMBER

86

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

7 JULY 2020

DATE OF EXPIRY

6 JULY 2023

CERTIFIED SINCE

7 JULY 2020

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](http://www.aluminium-
stewardship.org)*

CERTIFICATION SCOPE

Production of high end aluminium flat rolled products
in the Aleris Duffel facility for automotive, transport,
building and niche markets.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Aleris
ENTITY NAME	Aleris Aluminum Duffel BV
CERTIFICATION SCOPE	Production of high end aluminium flat rolled products in the Aleris Duffel facility for automotive, transport, building and niche markets.
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 V1
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	13 . 14 May 2020
AUDIT REPORT SUBMISSION	24 June 2020
AUDIT SCOPE	<p>The audit scope included the following:</p> <ul style="list-style-type: none">- Ingots, slabs, scrap ASI certified material reception.- Casting and Mill production of semis for the automotive, transport, building and niche markets industry <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 Chain of Custody Standard were included in the audit scope.</p> <p>At the time of the audit, access to the site 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.</p>

AUDIT OUTCOME	<ul style="list-style-type: none"> • Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <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. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	7 July 2020 . 6 July 2023
NEXT AUDIT TYPE	Re-certification audit
NEXT AUDIT DUE DATE	6 July 2023
CERTIFICATE NUMBER	86

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Aleris is a founding member of the Aluminium Stewardship Initiative ASI. The site Duffel was certified against the ASI Performance standard in 2019, the link to ASI and its member status is set on the Aleris website https://duffel.aleris.com/locations/aleris-aluminum-duffel-bv-2
1.2 Management system	Conformance	Aleris has a well-established management system that is certified against ISO 14001. The ASI requirements are covered both by the existing management system and additional policies and procedures that were elaborated to cover the ASI specific requirements. All documents are available through the internal data management system.
1.3 Management system reviews	Conformance	Aleris conducts annual management reviews for its management system. The goals and projects are set in relation to the 17 United Nations Sustainable Development Goals SDGs. The ASI management review is incorporated from 2020 onwards together with ISO 14001 management review.
1.4 Management representative	Conformance	Aleris established a multi-disciplinary team for the implementation of the CoC Standard. The Q & EHS director is the nominated ASI director, the ASI project manager is the operational ASI responsible manager. The responsibilities are documented in the organizational chart.
1.5 Training	Conformance	New employees receive introduction training with ASI specific content added to this training. Staff that are involved in Chain-of-Custody related activities, received specific training on the procedures and instruction of the CoC implementation. All training is registered and recorded by the HR department.
1.6 Record keeping	Conformance	The ASI Mass Balance System is integrated in the SAP environment, records are therefore kept in the system for at least more than 5 years. Copies of the certificates are made automatically and stored in a folder.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	Aleris defines in its process instruction that the reporting of the ASI material has to be done to ASI within the first three months of the following

CRITERION	RATING	COMMENT
		year. A detailed template was modified so that numbers can be generated automatically from the SAP system.
1.7b Reporting to ASI (Input Percentage)	Conformance	Aleris defines in its process instructions that the reporting of ASI material has to be done to ASI within the first three months of the following year. The input percentage is included in the reported information.
1.7c Reporting to ASI (Positive Balance)	Conformance	Aleris defines in its process instruction that the reporting of ASI material has to be done to ASI within the first three months of the following year. Reported data also includes any positive material balance - if applicable. A daily balance is calculated automatically in the SAP system.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	Aleris defines in its process instruction that the reporting of ASI material has to be done to ASI within the first three months of the following year. All numbers are calculated and controlled in SAP on a daily basis, any overdraw is therefore detected.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	Aleris defines in its process instruction that the reporting of ASI material has to be done to ASI within the first three months of the following year. All numbers regarding eligible scrap are included in the reporting.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	Aleris defines in its process instruction that the reporting of ASI material has to be done to ASI within the first three months of the following year. The quantity of ASI Aluminium located to ASI Credits is foreseen to be reported, no Credits have been allocated so far.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	Aleris defines in its process instruction that the reporting of ASI material has to be done to ASI within the first three months of the following year. The quantity of ASI purchased slab within the credit system is foreseen to be reported, no Credits have been purchased so far.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit
2.2a Control of CoC Material	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit

CRITERION	RATING	COMMENT
2.2b No further outsourcing	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit
2.2c Risk assessment	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit
2.3 Output Quantity	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit
2.4 Verification and record-keeping	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit
2.5 Error management	Not Applicable	Aleris decided not to include outsourcing in the scope of the CoC certification at the first audit

3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

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	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	Conformance	The Entity is engaged in Aluminium Re-melting/Refining at the site in Duffel, Belgium. The plant is already certified against the ASI Performance standard since 2019 (Certificate No. 31)
4.1b ASI Performance Standard . Aluminium Re-Melting/Refining	Conformance	The Entity is certified against the ASI Performance Standard since July 2019.
4.2a Pre-Consumer Scrap and Dross	Conformance	Aleris has a Material Accounting System in place to control and account for all sources of the supply chain. A due diligence process and transparent traceability system covering eligible pre-consumer scrap is established.
4.2b Post-Consumer Scrap	Conformance	Aleris has a Material Accounting System in place to control and account for all sources of the

CRITERION	RATING	COMMENT
		supply chain. A due diligence process and transparent traceability system covering eligible pre-consumer scrap is established.
4.3a Supplier records	Conformance	The Aleris Material Accounting System is designed to control and account for all sources of scrap and their origin coming into the supply chain. All suppliers are qualified and there is full traceability to control the identity, principals and place/s of operation of all direct suppliers of recyclable scrap material.
4.3b Cash payments	Not Applicable	Aleris has a policy in place where no cash payment is allowed. This is confirmed by an external auditor on an annual basis.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope . Casthouses	Conformance	Aleris produces casthouse products from primary aluminium and recycled aluminium within its scope, that comes either from the own certified cast-house or an external casthouse certified against ASI performance and CoC Standard.
5.1b ASI Performance Standard . Casthouses	Conformance	Aleris is producing casthouse products from primary aluminium and recycled aluminium. This site was certified against the ASI Performance Standard in 2019.
5.2 Casthouse Products	Conformance	Aleris has an accounting system in place to trace and link the products to the input quantity of CoC Material.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope . Post-Casthouse	Conformance	The post casthouse entity of Aleris is included in the ASI Performance certification.
6.1b ASI Performance Standard . Post-Casthouse	Conformance	The post casthouse entity of Aleris is included in the ASI Performance Standard Certificate No 31, issued in July 2019.
6.1c Sourcing ASI Aluminium	Conformance	Aleris has a Material Handling System in place ensuring the identification of CoC and non CoC Material.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Aleris has a supplier code of conduct which addresses anti-corruption. The code of conduct has to be signed by relevant suppliers (see https://duffel.aleris.com/wp-content/uploads/2020/05/Aleris-Duffel-Code-of-Conduct-Policy.pdf)

CRITERION	RATING	COMMENT
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Aleris has a supplier code of conduct which addresses responsible sourcing. The code has to be signed by relevant suppliers (see https://duffel.aleris.com/wp-content/uploads/2020/05/Aleris-Duffel-Code-of-Conduct-Policy.pdf)
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	Aleris has a supplier code of conduct that addresses human rights. The code of conduct has to be signed by relevant suppliers (see https://duffel.aleris.com/wp-content/uploads/2020/05/Aleris-Duffel-Code-of-Conduct-Policy.pdf)
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	Aleris has a supplier code of conduct addresses conflict-affected and high risk areas. Relevant suppliers have to sign the code of conduct (see https://duffel.aleris.com/wp-content/uploads/2020/05/Aleris-Duffel-Code-of-Conduct-Policy.pdf)
7.2 Risk assessment	Conformance	Aleris has a supplier code of conduct. The code of conduct has to be signed by suppliers. A due-diligence risk assessment is always done prior to starting business with new suppliers.
7.3 Complaints mechanism	Conformance	Aleris has established a complaint mechanisms and makes it possible to raise concerns through different channels (see https://de.aleris.com/locations/aleris-aluminum-duffel-bv-2/aleris-duffel-code-of-conduct-policy/ with the possibility to raise claims per mail to info.duffel@aleris.com or by phone at: +32(0)15/302111).
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Aleris records all inputs and outputs of material in its SAP system, where they can be traced. All ASI relevant purchases and sales are documented in addition in pdf documents.
8.2a Post-Consumer Scrap	Conformance	Aleris installed a Mass Balance System based on its SAP system that records all inputs and outputs of material. The input quantity of Post-Consumer Scrap is recorded.
8.2b Pre-Consumer Scrap (total)	Conformance	Aleris installed a Mass Balance System based on its SAP system that records all inputs and outputs of material. The input quantity of Pre-Consumer Scrap is recorded.

CRITERION	RATING	COMMENT
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	Aleris installed a Mass Balance System based on its SAP system that records all inputs and outputs of material. The input quantity of Pre-Consumer Scrap from COC certified entities can be identified.
8.3 Material Accounting Period	Conformance	Aleris defined in its Mass Balance System the accounting period to be one year, which starts with the calendar year on the 1st January and ends on the 31st December of each year.
8.4 Input Percentage	Conformance	Aleris records and calculates the input for a material accounting period of one year as required by the standard. The formula is programmed into the Mass Balance System.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	Aleris records and calculates the input percentage for a material accounting period of one year as required by the standard. The formula is programmed into the Mass Balance System.
8.6 Output Quantity determination	Conformance	Aleris uses the input percentage for a material accounting period of one year as required by the standard. The formula is programmed into the Mass Balance System.
8.7 Output Quantity designation	Conformance	Based on the material accounting system, material that is sold as ASI CoC Material is designated 100% ASI CoC Material.
8.8 Output Quantity . Pre-Consumer Scrap	Conformance	If Aleris designates eligible scrap, it uses the calculated input percentage. This is also checked by the ASI responsible.
8.9 Outputs not exceed inputs	Conformance	Aleris programmed its material accounting system in a way to control, that the total output percentage does not exceed the input percentage. An automatic alarm is set on a daily basis to warn, if the output exceeds the input and the necessary steps can be taken, not to exceed the input in the accounting period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	Aleris controls the input-output balance on a monthly basis as a minimum. To avoid an overdraw of more than 20%, Aleris programmed in its material accounting system an alarm procedure, that sets an alarm if the total output of ASI certified material exceeds 20% of the total input.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The level of internal overdraw caused by an unforeseen, unexpected and not predictable

CRITERION	RATING	COMMENT
		situation in respect to a contract for delivery to an entity is visible for each material accounting period. Aleris controls on a monthly basis the input-output balance and programmed an alarm, to avoid an overdraw and to set the necessary steps to correct this situation
8.10c Internal Overdraws (period to make up)	Conformance	Aleris regulates in its process instruction, that an internal overdraw shall be made up in the next accounting period.
8.11a Positive Balance (carry over)	Conformance	Aleris describes in its procedure "ASI002 annual reporting", that a positive balance of unused ASI certified material can be carried over into the next calendar year but has to be reported accordingly.
8.11b Positive Balance (expiry)	Conformance	Aleris describes in its procedure about the annual reporting, that a positive balance of unused ASI certified material can be carried over into the next calendar year but expires at the end of that period. It has to be marked in the system.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	Aleris generates parallel to the invoice for ASI certified material ASI certificates. These certificates are submitted together with the invoice. For customers that do not get invoices like self-billing customers, the certificates are gathered on a monthly basis and submitted to them.
9.2a Date of issue	Conformance	All CoC documents carry the date of issuing the certificate
9.2b Reference number	Conformance	All CoC documents carry the reference number of the CoC document, which is linked to the material accounting system.
9.2c Issuing Entity	Conformance	All CoC documents carry the entity, address and COC number of Aleris.
9.2d Receiving customer	Conformance	All CoC documents carry the entity, address and CoC number of the company receiving CoC certified material. If the receiving company is CoC certified, the documents also carry the ASI certification number of the receiving company.
9.2e Responsible employee	Conformance	All CoC documents carry name and contact details of the ASI responsible person of Aleris, who can verify the provided information.

CRITERION	RATING	COMMENT
9.2f Conformance statement	Conformance	All CoC documents carry the claim "The information provided in the CoC Document is in conformance with the ASI CoC Standard".
9.2g Type of CoC Material	Conformance	All CoC documents specify the type of CoC Material in the shipment. This description is copied from the original shipping documents.
9.2h Mass of CoC Material	Conformance	All CoC documents include the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	All CoC documents include the total mass of material in the shipment.
9.3a Sustainability Data (optional)	Conformance	Aleris provides with its CoC documents the average intensity of Greenhouse Gas emissions (GHGs) in tonnes CO2-eq.
9.3b Sustainability Data (passing on)	Conformance	Aleris provides with its CoC documents the average intensity of Greenhouse Gas emissions (GHGs) in tonnes CO2-eq.
9.3c Post-Casthouse ASI Certification status	Conformance	Aleris provides the certification number of the entity in its CoC documents.
9.4 Supplementary Information (optional)	Conformance	Through the delivery number on the document, all information can be traced back to the used material. Information like the sourcing policy or the status of the ISO 14001 certification can be checked on the Aleris website (see https://duffel.aleris.com or https://duffel.aleris.com/wp-content/uploads/2020/01/Certificaat-ISO-14001-2019-2022.pdf)
9.5 Response to verification requests	Conformance	Aleris defines in its mass balance procedure, how errors - if they occur in connection with issued CoC documents - have to be handled. A responsible person is nominated on the certificate and can be contacted to investigate the incident.
9.6 Error management	Conformance	Aleris defines in its mass balance procedure, how errors - if they occur - have to be handled. The ASI responsible investigates this incident and issues in agreement with the customer a new or corrected CoC certificates.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	Aleris defines in its procedure "VAK012 Receiving ASI CoC Documents" and in a template for receiving ASI documents, how to proceed with received documents. All the

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		requirements specified by the CoC Standard in 9.2 and 9.3 are verified.
10.2 Verify consistency with shipments	Conformance	Aleris defines in its procedure "VAK012 Receiving ASI CoC Documents" the process to conduct a consistency check of the received material with the provided documents.
10.3 Verify supplier CoC Certification status	Conformance	Aleris defines in its procedure "VAK013 Receiving ASI Documents" that the validity and scope of the ASI certificates of suppliers shall be checked once per quarter.
10.4 Error management	Conformance	A procedure exists "VAK003 Complaints and Evaluations" to handle and analyze any errors identified and to prevent the reoccurrence of the error.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System . allocation	Conformance	The credits are managed through the companies SAP system, where the amount of credits, that is sold, is deducted from the amount of purchased and allocated ASI material.
11.1b Link to Casthouse Products	Conformance	All sold amounts of credits are identified through unique numbers on the certificate.
11.1c No double counting	Conformance	All sold amounts of credits are identified through unique numbers on the certificate and are registered in the SAP system responsibilities, in the material balance to prevent double counting.
11.1d No Positive Balance for ASI Credits	Conformance	Aleris states in its instruction, that all credits have to be registered in the material accounting system and that no balance can be carried over to the next period.
11.2a Date of issue	Conformance	Aleris provides the date of issuing the certificate on ASI Credit certificates.
11.2b Reference number	Conformance	Aleris provides ASI Credit certificates that carry the unique certificate number, which is linked to the material accounting system and can be verified accordingly.
11.2c Issuing Entity	Conformance	Aleris provides ASI Credit certificates that carry the identity, address, contact email and CoC certification number of the entity issuing the ASI certificate.
11.2d Receiving Entity	Conformance	Aleris provides ASI Credit certificates that carry the identity, address, contact email and CoC

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		certification number of the entity receiving the ASI certificate.
11.2e Conformance statement	Conformance	Aleris provides ASI Credit certificates that carry the statement "The information provided in the ASI Credits Certificate is in conformance with the ASI CoC Standard".
11.2f ASI Credits statement	Conformance	Aleris provides ASI Credit certificates that carry the statement "ASI Credits may not be re-traded. ASI credits may not be allocated to physical products or otherwise claimed as ASI Aluminium"
11.2g Quantity	Conformance	Aleris provides ASI Credit certificates that carry the amount of allocated ASI credits in tons.
11.3a CoC Certification Scope . purchasing ASI Credits	Conformance	Aleris defines in its procedure that credits may only be bought within Aleris CoC Certification Scope.
11.3b Material Accounting System . purchasing	Conformance	Aleris keeps records of all ASI credit certificates. All credits purchased are accounted for in the material accounting system SAP.
11.3c Expiry	Conformance	Aleris defines in its procedures, that all unused credits expire at the end of the accounting period and that no credits can be carried over to the next accounting period.
11.3d No re-trading	Conformance	Aleris defines in its procedure, that ASI credits cannot be re-traded.
11.3e No allocation to physical products	Conformance	Aleris defines in its documents, that ASI credits cannot be allocated to physical products or claimed as ASI Aluminium.
11.3f Verify supplier CoC Certification status	Conformance	Aleris keeps the credit certificates of the suppliers in a special file and controls on a regular basis, if the certificates of the suppliers are still valid.
11.3g Five years maximum for ASI Credits purchasing	Conformance	Aleris defines in its procedures according to the CoC Standard, that the maximum period for purchasing ASI credits is five years.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Aleris defines that external communication about ASI has to be in accordance with the ASI requirements. Aleris links on its website to the ASI website and the Aleris report (see https://duffel.aleris.com/locations/aleris-aluminum-duffel-by-2/)

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	All claims and presentations made on behalf of Aleris about ASI are based on facts and figures from life-cycle assessments and studies.
12.1c Employee training	Conformance	Aleris provides adequate training to all relevant employees to properly understand and communicate ASI.

Document Control and Version History

Revision	Date	Notes
0	7 July 2020	Issued (Full Certification)