

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

HYDRO ALUMINIUM EXTRUDED SOLUTIONS

CERTIFICATE
NUMBER

80

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

7 APRIL 2020

DATE OF EXPIRY

6 APRIL 2023

CERTIFIED SINCE

7 APRIL 2020

AUTHORISED BY

A handwritten signature in white ink, appearing 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*

CERTIFICATION SCOPE

Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope cover the Hydro sites: Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), GódŰ (Poland), Tibshelf (UK), Tønder Precision Tubing (Denmark) and Trzcianka (Poland).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Aluminium Extruded Solutions
CERTIFICATION SCOPE	Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites: Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), GódŰ(Poland), Tibshelf (UK) Tønder Precision Tubing (Denmark) and Trzcianka (Poland).
SUPPLY CHAIN ACTIVITIES	• Casthouses • Post-Casthouse
ASI STANDARD	• Chain of Custody Standard V1
AUDIT TYPE	• First Certification Audit (12 November 2019 ñ 24 January 2020) • Scope Change Audit (5 May 2020 ñ 6 May 2020)
AUDIT FIRM	DNV GL
AUDIT DATE	• 12 November 2019 ñ 24 January 2020 (Certification Audit) • 5 May 2020 ñ 6 May 2020 (Scope Change Audit)
AUDIT REPORT SUBMISSION	• 4 April 2020 (Certification Audit) • 8 July 2020 (Scope Change Audit)
AUDIT SCOPE	<u>Initial Certification Audit (12 November 2019 ñ 24 January 2020)</u> The audit scope covers the activities at the Hydro sites: Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), Tibshelf (UK), Tønder Precision Tubing (Denmark) and Trzcianka (Poland). Supply chain activities included in the audit scope: • Casthouses • Post-Casthouse All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope. <u>First Scope Change Audit (5 May 2020 ñ 6 May 2020)</u> The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at GódŰ(Poland).

Supply chain activities included in the audit scope:

- Casthouses
- Post-Casthouse

All relevant criteria in the ASI Performance Standard were included in the audit scope.

At the time of the audit (May 2020), 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.

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

7 April 2020 to 6 April 2023

NEXT AUDIT
TYPE

Surveillance audit

NEXT AUDIT
DUE DATE

6 April 2021

CERTIFICATE
NUMBER

80

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 holds certification on the Performance Standard as well.
1.2 Management system	Conformance	The Entity has created a management system that addresses all applicable requirements of the CoC Standard. An ASI Management System Document is developed. The document describes in detail the management system, purpose, scope, responsibilities, functions, Management, Management Reviews, Corrective and Preventative Measures and documentation and record retention, which gives governance of the CoC system.
1.3 Management system reviews	Conformance	The Entity has created a management system that addresses all applicable requirements of the CoC Standard. An ASI Management System Document is developed. The document describes in detail the management system, purpose, scope, responsibilities, functions, Management, Management Reviews, Corrective and Preventative Measures and documentation and record retention, which gives governance of the CoC system.
1.4 Management representative	Conformance	The Entity has appointed a member of management as the responsible person for ASI CoC Standard implementation and defined a chart of responsibilities for different tasks through the organization.
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.
1.6 Record keeping	Conformance	The Entity maintains up-to-date records (Management System) covering all applicable requirements of the CoC Standard.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	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)	Conformance	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

CRITERION	RATING	COMMENT
		end of each calendar year which conforms to ASI CoC requirements.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's operating procedure specified that the Entity will report Positive Balance of CoC Material 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)	Conformance	The Entity's operating procedure specified that the Entity will report any Internal Overdraw of CoC Material 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)	Conformance	The Entity's operating procedure specified that the Entity 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 tools to govern and control ownership of CoC material used by outsourcing partners.
2.2c Risk assessment	Conformance	The Entity has assessed the risk of potential non-conformance with the CoC Standard resulting from the engagement of each Outsourcing Contractor. ASI CoC Management System including relevant guidelines and procedures ñ e.g. Due Diligence procedure, Procurement risk assessment tools and Supplier risk assessment tools.
2.3 Output Quantity	Conformance	The Entity has processes to ensure that the Outsourcing Contractor provides information on Output Quantity of CoC Material to the Entity at the conclusion of the Entity's Material Accounting Period.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Conformance	The Entity has processes to verify that the Output Quantity of CoC Material is consistent with the Input Quantity of CoC Material provided to the Outsourcing Contractor, and record it in its Material Accounting System.
2.5 Error management	Conformance	The Entity has processes to verify that if error is discovered after CoC Material has been shipped, the Entity and the Outsourcing Contractor shall document the error and the agreed steps taken to correct it, and implement actions to avoid a recurrence.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope ñ Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard ñ Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope ñ Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard ñ Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope ñ Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard ñ 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 ñ Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard ñ 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.

CRITERION	RATING	COMMENT
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope ñ Casthouses	Conformance	The Entity has a system in place ensuring that ASI Aluminium is produced only from Casthouses that are either within the Entity's CoC Certification Scope or are certified against the ASI Performance Standard.
5.1b ASI Performance Standard ñ Casthouses	Conformance	The Entity has a system in place ensuring that ASI Aluminium is produced only from Casthouses that are either within the Entity's CoC Certification Scope or are certified against the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Entity's Material Accounting System ensure that unique identification numbers can be linked to the Input Quantity of CoC Material for that Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope ñ Post-Casthouse	Conformance	The Entity's Operating Procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC materials
6.1b ASI Performance Standard ñ Post-Casthouse	Conformance	The Entity's Operating Procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC materials.
6.1c Sourcing ASI Aluminium	Conformance	The Entity's Operating Procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC materials.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has developed a responsible sourcing policy covering all aspects of the ASI CoC and applicable ASI Performance Standard criteria.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has adopted a responsible sourcing policy covering Aluminium, which conforms to the requirements of ASI CoC criteria and applicable ASI Performance Standard criteria.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has developed policies, procedures and processes regarding responsible sourcing, Human Rights Due Diligence that conform to ASI CoC criteria and applicable ASI Performance Standard criteria.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has developed and maintains policies, procedures and processes that conform to ASI CoC criteria and applicable ASI Performance Standard criteria.

CRITERION	RATING	COMMENT
7.2 Risk assessment	Conformance	Procurement Risk Assessment completed and the ASI CoC Management System file established ñ including all relevant guidelines and procedures ñ e.g. Due Diligence procedure, Procurement risk assessment tools and Supplier risk assessment tools
7.3 Complaints mechanism	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the web: https://www.hydro.com/en/contact-us/
8 MASS BALANCE SYSTEM: CoC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass which conforms to ASI CoC requirement.
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 will use a 12 month rolling period, as their accounting period. This is clearly stated in the ASI Management System Document Chain of Custody that has been developed for the ASI CoC Standard.
8.4 Input Percentage	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements.
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 Entity has established a Material Accounting system in compliance with ASI CoC requirements.
8.7 Output Quantity designation	Conformance	Entity's output quantity is designated as 100% CoC material as per Material Account System procedures and processes.
8.8 Output Quantity ñ Pre-Consumer Scrap	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements.
8.9 Outputs not exceed inputs	Conformance	The Entity has established a Material Accounting system in compliance with ASI CoC requirements,

CRITERION	RATING	COMMENT
		and to have updated information on inventory balance on a monthly basis which conforms to the ASI Chain of Custody Standard requirement.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established a Material Accounting system in compliance with the ASI Chain of Custody requirements.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established a Material Accounting system in compliance with the ASI Chain of Custody requirements.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a Material Accounting system in compliance with the ASI Chain of Custody requirements.
8.11a Positive Balance (carry over)	Conformance	The Entity has established a Material Accounting system in compliance with the ASI Chain of Custody requirements.
8.11b Positive Balance (expiry)	Conformance	The Entity has established a Material Accounting system in compliance with the ASI Chain of Custody requirements.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2a Date of issue	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2b Reference number	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2c Issuing Entity	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2d Receiving customer	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2e Responsible employee	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC

CRITERION	RATING	COMMENT
		documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2f Conformance statement	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2g Type of CoC Material	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2h Mass of CoC Material	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2i Mass of total material	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.3a Sustainability Data (optional)	Conformance	The Entity has established both a procedure and an ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable Sustainability Data in the CoC Document for CoC Material.
9.3b Sustainability Data (passing on)	Conformance	The Entity has established both a procedure and a ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable Sustainability Data in the CoC Document for CoC Material.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has established both a procedure and a ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable Sustainability Data in the CoC Document for CoC Material.
9.4 Supplementary Information (optional)	Conformance	The Entity has established both a procedure and a ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.5 Response to verification requests	Conformance	The Entity has established both a procedure and a ASI CoC Document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements, including

CRITERION	RATING	COMMENT
		responding to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error management	Conformance	The Entity's procedures includes error management as per ASI Chain of Custody requirement The Entity will inform relevant stakeholders on the situation regarding the error and agree on necessary corrective actions / improvements.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements.
10.2 Verify consistency with shipments	Conformance	The Entity has established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements.
10.4 Error management	Conformance	The Entity has established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System ñ allocation	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system

CRITERION	RATING	COMMENT
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3a CoC Certification Scope ñ purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3b Material Accounting System ñ purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.

Document Control and Version History

Revision	Date	Notes
0	7 April 2020	Issued (Full Certification)
1	11 June 2020	Correction to conformance rating of criterion 2.1
2	14 July 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site GódŰ(Poland).