

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

HYDRO ALUMINIUM PRIMARY METAL

CERTIFICATE
NUMBER

42

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

14 AUGUST 2019

DATE OF EXPIRY

13 AUGUST 2022

CERTIFIED SINCE

14 AUGUST 2019

AUTHORISED BY

A stylized, handwritten signature in white ink, likely belonging to a representative of the Aluminium Stewardship Initiative.

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

CERTIFICATION SCOPE

Chain of Custody for Hydro Aluminium Primary Metal including the smelting, re-smelting/refining and casthouse activities at the production sites Azuqueca, Clearvaux, Commerce, Deeside, Henderson, Luce, Rackwitz, Husnes, Høyanger, Karmøy, Sunndal and Årdal, and Hydro Corporate Office.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Aluminium Primary Metal
CERTIFICATION SCOPE	Chain of Custody for Hydro Aluminium Primary Metal including the smelting, re-smelting/refining and casthouse activities at the production sites Azuqueca, Clearvaux, Commerce, Deeside, Henderson, Luce, Rackwitz, Husnes, Høyanger, Karmøy, Sunndal and Årdal, and Hydro Corporate Office.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting / RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit (19 October 2018, 3 November 2018, 21 November 2018, 18 December 2018, 18 . 19 February 2019, 10 . 13 May 2019)Scope Change Audit (24 September 2019 . 14 May 2020)
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">19 October 2018, 3 November 2018, 21 November 2018, 18 December 2018, 18 . 19 February 2019, 10 . 13 May 2019 (First Certification Audit)24 September 2019 . 14 May 2020 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">24 July 2019 (First Certification Audit)9 September 2020 (Scope Change Audit)
AUDIT SCOPE	<p><u>First Certification Audit (19 October 2018, 3 November 2018, 21 November 2018, 18 December 2018, 18 . 19 February 2019, 10 . 13 May 2019)</u></p> <p>Chain of Custody for Hydro Aluminium Primary Metal including the smelting, re-smelting/refining and casthouse activities at the production sites Clearvaux, Høyanger, Karmøy, Sunndal and Årdal, and Hydro Corporate Office.</p> <p>Supply chain activities included in the audit scope:</p>

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

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

Scope Change Audit (24 September 2019 . 14 May 2020)

Chain of Custody for Hydro Aluminium Primary Metal including the smelting, re-smelting/refining and casthouse activities at the production sites Rackwitz (casthouse), Azuqueca, Commerce, Deeside, Henderson, Husnes and Luce (casthouse).

Supply chain activities included in the audit scope:

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

All 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

14 August 2019 . 13 August 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

13 February 2021

CERTIFICATION
NUMBER

42

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 membership obligations and the ASI Complaints Mechanism. The Entity is in the smelting, re-melting/refining and casthouse category and holds certification on 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 logo. A Management System Documentation Procedure is developed. The procedure describes the objective, scope, responsibilities, 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 Chain of Custody 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. A Steering Committee is established and oversee the implementation and governance of the management system established
1.4 Management representative	Conformance	The Entity has appointed the Head Office Safety Health and Environment department to be responsible for the ASI CoC Standard implementation and conformance with the requirements in the standard. A nominated team is responsible for the continuous management of the ASI certification system.
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the CoC Standard. Adequate training is performed.
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 define the retention time and systems in use.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity's operating procedure specifies that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI

CRITERION	RATING	COMMENT
		CoC requirements. An annual report for the year 2019 was submitted to ASI on the 25th March 2020.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity's operating procedure specifies that the Entity will report Input Percentage to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements. The 1. report was submitted to ASI on the 25th of March 2020 in compliance with the reporting requirements.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's operating procedure specifies that the Entity will report any Positive Balance to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements. The 1. report was submitted to ASI on the 25th of March 2020 in compliance with the reporting requirements.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity's operating procedure specifies 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. The 1. report was submitted to ASI on the 25th of March 2020 in compliance with the reporting requirements.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity's operating procedure specifies 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. The 1. report was submitted to ASI on the 25th of March 2020 in compliance with the reporting requirements.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity has decided not to engage in purchasing/trading credits.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity has decided not to engage in purchasing/trading credits.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Not applicable as no outsourcing activity takes place.
2.2a Control of CoC Material	Not Applicable	Not applicable as no outsourcing activity takes place.

CRITERION	RATING	COMMENT
2.2b No further outsourcing	Not Applicable	Not applicable as no outsourcing activity takes place.
2.2c Risk assessment	Not Applicable	Not applicable as no outsourcing activity takes place.
2.3 Output Quantity	Not Applicable	Not applicable as no outsourcing activity takes place.
2.4 Verification and record-keeping	Not Applicable	Not applicable as no outsourcing activity takes place.
2.5 Error management	Not Applicable	Not applicable as no outsourcing activity takes place.

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	Conformance	The Entity is engaged in Aluminium Smelting and the Certification Scope consist of fully owned smelters that already are ASI Performance Standard certified.
3.3b ASI Performance Standard . Aluminium Smelting	Conformance	The Entity is engaged in Aluminium Smelting and the Certification Scope consist of fully owned smelters that already are ASI Performance Standard certified.

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 and the Certification Scope consists of fully owned plants that already are ASI Performance Standard certified.
4.1b ASI Performance Standard . Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-Melting/Refining and the Certification Scope consist of fully owned plants that already are ASI Performance Standard certified.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity Material Accounting System is designed to control and account for all sources of scrap coming into the value chain. A due diligence process

CRITERION	RATING	COMMENT
		and transparent traceability system covering both eligible pre-consumer scrap and dross is established.
4.2b Post-Consumer Scrap	Conformance	The Entity Material Accounting System is designed to control and account for all sources of scrap coming in to the value chain. A due diligence process and transparent traceability system covering eligible post-consumer scrap is established.
4.3a Supplier records	Conformance	The Entity Material Accounting System is designed to control and account for all sources of scrap and their origin coming in to the value chain. All suppliers are pre-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	The Entity confirms to the auditor that no cash payment occurs.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope . Casthouses	Conformance	The Entity is engaged in producing Casthouse Products from primary Aluminium and recycled Aluminium. The Certification Scope consists of fully owned plants that already are ASI Performance Standard certified.
5.1b ASI Performance Standard . Casthouses	Conformance	The Entity is engaged in producing Casthouse Products from primary Aluminium and recycled Aluminium. The Certification Scope consists of fully owned plants that already are ASI Performance Standard certified.
5.2 Casthouse Products	Conformance	The Entity Material Accounting System gives full traceability through product identification on all shipments and deliveries from the casthouses. A traceability system is established to give detailed information to clients on the unique history of the product.
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.

CRITERION	RATING	COMMENT
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 and due diligence risk assessment is always done prior to starting business with the Entity: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/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/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established a supplier responsible sourcing framework. The code of conduct is mandatory to be signed by suppliers. Human Rights is one of the topics addressed in the Code of Conduct: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has established a supplier responsible sourcing framework. The code of conduct is mandatory to be signed by suppliers. The Entity covered by the scope of certification is not operating or involved in high risk or conflict-affected areas in the supply chain. A Conflict Mineral Statement is developed to instruct suppliers and customers that they do not source minerals from conflict affected and high risk areas: https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct.pdf
7.2 Risk assessment	Conformance	The Entity has established a supplier code of conduct. The code of conduct is mandatory to be signed by suppliers and a due-diligence risk assessment is always done prior to starting business with the Entity. If a supplier is not compliant with the requirements and repeatedly fail to correct critical findings, contracts will be terminated.
7.3 Complaints mechanism	Conformance	The Entity has established complaint mechanisms and makes it possible to raise concerns through different channels. For instance, through the web: https://www.hydro.com/en/contact-us/

CRITERION	RATING	COMMENT
		or email: Compliance@hydro.com
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System in place to govern and report on input quantity as well as output quantity of Chain of Custody material and non- Chain of Custody material.
8.2a Post-Consumer Scrap	Conformance	The Entity's remelters record the input of recycling scrap in three fractions: post-consumer scrap, pre-consumer scrap (total) and pre-consumer scrap that is eligible (supplied directly from a Chain of Custody certified Entity).
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's production plants records the input of recycling scrap in three fractions: post-consumer scrap, pre-consumer scrap (total) and pre-consumer scrap that is eligible scrap (supplied directly from a Chain of Custody certified Entity).
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity's remelters records the input of recycling scrap in three fractions: post-consumer scrap, pre-consumer scrap (total) and pre-consumer scrap that is eligible scrap (supplied directly from a Chain of Custody certified Entity).
8.3 Material Accounting Period	Conformance	The Entity has decided to use the period from January to December as their accounting period.
8.4 Input Percentage	Conformance	The Entity's 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 Remelter Metal Accounting System calculates the input percentage in line with the requirements in the standard.
8.6 Output Quantity determination	Conformance	The Entity 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 Chain of Custody 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 Material accounting system calculates the output quantity from internal eligible pre-consumer scrap in line with the requirements in the standard.

CRITERION	RATING	COMMENT
8.9 Outputs not exceed inputs	Conformance	The Entity Material accounting system and internal control mechanisms will assure that outputs do not exceed inputs in line with the requirements in the standard. An internal Steering Committee oversees that the mass balance is correct calculated.
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 Material accounting system and internal control mechanisms will assure that the internal overdraw does not exceed the amount of Chain of Custody Material affected by a force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity Material accounting system and internal control mechanisms will assure that internal overdraw to be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity 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 Material accounting system and internal control mechanisms will assure that a positive balance 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 Chain of Custody material.
9.2a Date of issue	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on issue date.
9.2b Reference number	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information including a reference number and material code.
9.2c Issuing Entity	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on issuing Entity.

CRITERION	RATING	COMMENT
9.2d Receiving customer	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on receiving customer.
9.2e Responsible employee	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on issuing Entity and the responsible employees of the Entity who can verify information in the Chain of Custody document.
9.2f Conformance statement	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on a statement of conformance related to ASI requirements.
9.2g Type of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on type of Chain of Custody material shipped.
9.2h Mass of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on mass of Chain of Custody Material in the shipment.
9.2i Mass of total material	Conformance	The Entity has developed documents and records to follow shipments and transfer of Chain of Custody material with information on mass of total material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	The Entity is not planning to add supplementary sustainability data information on Chain of Custody documentation.
9.3b Sustainability Data (passing on)	Not Applicable	The Entity is not planning to add supplementary sustainability data information on Chain of Custody documentation.
9.3c Post-Casthouse ASI Certification status	Not Applicable	The Entity is not planning to add supplementary sustainability data information on Chain of Custody documentation.
9.4 Supplementary Information (optional)	Not Applicable	The Entity is not planning to add supplementary information.
9.5 Response to verification requests	Conformance	The Entity has a system in place to respond to request for verification of information in Chain of Custody documents issued.
9.6 Error management	Conformance	The Entity has developed an error management procedure.

CRITERION	RATING	COMMENT
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has a management system procedure and established routines to regularly check the consistency of the Chain of Custody documents before recording information in the accounting system.
10.2 Verify consistency with shipments	Conformance	The Entity has a management system procedure and established routines to regularly check the consistency of the Chain of Custody 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	Hydro Primary Metal does not engage in ASI Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.1c No double counting	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2a Date of issue	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2b Reference number	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2c Issuing Entity	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2d Receiving Entity	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2e Conformance statement	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.2f ASI Credits statement	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3a CoC Certification Scope . purchasing ASI Credits	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3b Material Accounting System . purchasing	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3c Expiry	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3d No re-trading	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3e No allocation to physical products	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	Hydro Primary Metal does not engage in ASI Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Hydro Primary Metal does not engage in 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 Claim 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 guideline.
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 guideline, also including training instructions.

Document Control and Version History

Revision	Date	Notes
0	14 August 2019	Issued (Initial Certification)
1	21 September 2020	Updated to reflect Certification Scope change with addition of the Rackwitz (cathouse), Azuqueca, Commerce, Deeside, Henderson, Husnes and Luce (cathouse) facilities, and a correction to the Next Audit Date from the previous Certificate (Rev 0).