

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# NOVELIS KOREA LIMITED

CERTIFICATE  
NUMBER

184

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

8 FEBRUARY 2022

DATE OF EXPIRY

7 FEBRUARY 2025

CERTIFIED SINCE

8 FEBRUARY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

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

CERTIFICATION SCOPE

The manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Korea Limited
CERTIFICATION SCOPE	The manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Chain of Custody Standard V1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>10 – 14 January 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>27 January 2022</li></ul>
AUDIT SCOPE	<p>The audit scope covered the manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul> <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	8 February 2022 – 7 February 2025
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	8 August 2023
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CERTIFICATION NUMBER	184
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an active ASI Member committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity falls under the Production and Transformation member class category. The Entity's ASI membership can be reached at: <a href="https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc/">https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc/</a> .
1.2 Management system	Conformance	The Entity's documented ASI CoC Management Systems addressing all applicable requirements of the ASI Chain-of-Custody (CoC) Standard under the Control of the Entity are established and maintained. The Entity's ASI CoC Management Systems are developed to handle and manage ASI CoC Materials. At the time of the audit, there were no examples of effective implementation of the system as there were no sourcing and transfer of CoC Materials.
1.3 Management system reviews	Conformance	The Entity has an annual review process of the ASI CoC Management System to assess the effectiveness of the ASI CoC management and address potential areas of non-conformance and improvement. The first annual management review is planned for May 2022.
1.4 Management representative	Conformance	The Entity nominates senior management members as ASI Management Representatives (Vice President of Metal Procurement, Plant Manager) for the overall responsibility of the implementation of ASI CoC and for the conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity provides formal training to relevant personnel to raise awareness and competency of the ASI Chain of Custody Standard requirements and their related roles and responsibilities under the ASI CoC Management System.
1.6 Record keeping	Conformance	The Entity's Recording, Reporting and Documentation Procedure is established and it addresses at least five years of retention period for documents and records related to ASI CoC practices and performance.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity's Recording, Reporting and Documentation Procedure states annual reporting to ASI. This Criterion is not applicable for the first Certification Audit and no such data has yet been reported to the ASI Secretariat.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.

CRITERION	RATING	COMMENT
2.2c Risk assessment	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	The Criterion is not applicable as the Entity is not intending to use Outsourcing Contractors for the purposes of further processing, treatment or manufacturing.

### 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's CoC Certification Scope is defined as per the ASI Performance Standard Certification Scope which is "The manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and re-melting at the Yeongju Plant, Korea", and ASI Liquid Metal is not sourced from other CoC Certified Entities.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Conformance	The Entity is certified against the ASI Performance Standard (certificate number 140), and the certificate including scope of Aluminium Refining/Re-melting is accessible at:

CRITERION	RATING	COMMENT
		<a href="https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf</a>
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity's Due Diligence and Risk Management Procedure and list of suppliers providing Pre-Consumer Scrap, Aluminium (Secondary Ingots) recovered from Dross and Post-Consumer Scrap are established and maintained. The Entity's Manufacturing Execution System (MES) manages input, output and balances of Pre-Consumer Scrap, Aluminium recovered from Dross and Post-Consumer Scrap.
4.2b Post-Consumer Scrap	Conformance	The Entity's Due Diligence and Risk Management Procedure on Due Diligence of Post-Consumer Scrap suppliers is established. The Entity's Manufacturing Execution System (MES) manages input, output and balances of Post-Consumer Scrap by suppliers.
4.3a Supplier records	Conformance	The Entity's ASI Scrap Supplier Master List linked with the Entity's Digital Account System is established and updated by the Entity to monitor suppliers of recyclable scrap, and it includes identity, principals, and places of operation of all direct suppliers for Recyclable Scrap Materials.
4.3b Cash payments	Not Applicable	This Criterion is not applicable as the Entity does not make any cash payments as stated in the Entity's Due Diligence and Risk Management Procedure.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Conformance	The Entity's ASI Mass Balance Process states production of ASI Aluminium only from the Casthouse that is within the Entity's CoC Certification Scope and the Entity's CoC Certification Scope is identical with its ASI Performance Standard Certification Scope.
5.1b ASI Performance Standard - Casthouses	Conformance	The Entity is certified against the ASI Performance Standard and the certificate including scope of Casthouses is accessible at: <a href="https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf</a>
5.2 Casthouse Products	Conformance	The Entity's ASI Mass Balance Process states identification numbers shall be given to the Entity's Casthouse product (Slabs). Unique identification numbers (marking) are given to the Entity's Casthouse product and the identification numbers are linked with the Entity's Material Accounting System to trace Input Quantity of ASI CoC Material.

CRITERION	RATING	COMMENT
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity's ASI System Responsibility is in place to ensure production of ASI Aluminium only from the facility that is within the Entity's CoC Certification Scope or other Entities/Facilities within the CoC Certification Scope of another CoC Certified Entity.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity is certified against the ASI Performance Standard and the certificate including scope of Post-Casthouse is accessible at: <a href="https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf">https://aluminium-stewardship.org/wp-content/uploads/2021/07/ASI-Summary-Audit-Report-Novelis-Korea-Limited-Certificate-140-PS.pdf</a>
6.1c Sourcing ASI Aluminium	Conformance	The Entity has systems in place to ensure that the ASI Aluminium is purchased only from the eligible Entities/Facilities directly or indirectly via traders and warehouses. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity's Supplier Code of Conduct as a responsible sourcing policy addresses anti-corruption. The Entity's next tier Non-CoC Material suppliers are provided with the policy and required to sign the commitment letter to comply with the Entity's Supplier Code of Conduct covering anti-corruption. The responsible sourcing policy is published and accessible at the Entity's website at: <a href="https://www.novelis.com/suppliers">https://www.novelis.com/suppliers</a>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity's Supplier Code of Conduct as a responsible sourcing policy addresses responsible sourcing. The Entity's next tier Non-CoC Material suppliers are provided with the policy and required to sign the commitment letter to comply with the Entity's Supplier Code of Conduct covering responsible sourcing. The responsible sourcing policy is published and accessible at the Entity's website at: <a href="https://www.novelis.com/suppliers">https://www.novelis.com/suppliers</a>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity's Supplier Code of Conduct as a responsible sourcing policy addresses Human Rights Due Diligence. The Entity's next tier Non-CoC Material suppliers are provided with the policy and required to sign the commitment letter to comply with the Entity's Supplier Code of Conduct covering Due Diligence of Human Rights. The responsible sourcing policy is published and accessible at the Entity's website at: <a href="https://www.novelis.com/suppliers">https://www.novelis.com/suppliers</a>



CRITERION	RATING	COMMENT
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity's Supplier Code of Conduct as a responsible sourcing policy covers the Conflict Affected and High Risk Areas. The Entity's next tier Non-CoC Material suppliers are provided with the policy and required to sign the commitment letter to comply with the Entity's Supplier Code of Conduct covering Conflict Affected and High Risk Areas. The responsible sourcing policy is published and accessible at the Entity's website at: <a href="https://www.novelis.com/suppliers">https://www.novelis.com/suppliers</a>
7.2 Risk assessment	Conformance	A risk assessment is conducted to minimize the risk of non-compliance for the Entity's next tier suppliers (Non-CoC material suppliers, scrap suppliers, traders, warehouses). Subsequent risk mitigation efforts, where risks are identified, are established by the Entity.
7.3 Complaints mechanism	Conformance	The Entity's Complain Management Procedure enables external stakeholders, and interested parties to report concerns on non-compliance with the Entity's Supplier Code of Conduct. Methods of complaint reporting are communicated and accessible through the Entity's website at: <a href="https://www.novelis.com/contact">https://www.novelis.com/contact</a> and <a href="https://secure.ethicspoint.com/domain/media/en/gui/57484/index.html">https://secure.ethicspoint.com/domain/media/en/gui/57484/index.html</a>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	A Material Accounting System (on-line) has been established to control, manage and record Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass (kilogram).
8.2a Post-Consumer Scrap	Conformance	The Entity's ASI Mass Balance Process and Material Accounting System (on-line) has been established to control, manage and record input quantity breakdown of Recyclable Scrap Materials including Post-Consumer Scrap.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's ASI Mass Balance Process and Material Accounting System (on-line) has been established to control, manage and record Input Quantity breakdown of Recyclable Scrap Materials including total Pre-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity's ASI Mass Balance Process and Material Accounting System (on-line) has been established to control, manage and record Input Quantity breakdown of Recyclable Scrap Materials including Eligible Pre-Consumer Scrap.

CRITERION	RATING	COMMENT
8.3 Material Accounting Period	Conformance	The Material Accounting Period is defined as 12 months (from January 1 to December 31) in the Entity's ASI Mass Balance Process, and the Entity's Material Accounting System (on-line) is developed to manage the Material Accounting Period.
8.4 Input Percentage	Conformance	The Entity has established a process to calculate and record the Input Percentage in compliance with the ASI Chain of Custody Standard and the formula is stated in the Entity's ASI Mass Balance Process and System using the same numerator and denominator. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of ASI CoC Material.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Conformance	The Entity has established a process to calculate and record the Input Percentage of Eligible Scrap and Recyclable Scrap Material in compliance with the ASI Chain of Custody Standard and the formula is stated in the Entity's ASI Mass Balance Process and System using the same numerator and denominator. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of Eligible Scrap.
8.6 Output Quantity determination	Conformance	The Entity has established a Material Accounting System in compliance with ASI Chain of Custody Standard requirements to determine the Output Quantity by mass (kilogram). At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.7 Output Quantity designation	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody Standard requirements, and method to designate the Output Quantity of CoC Material is defined in the Entity's ASI Recording, Reporting and Documentation Procedure. At the time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Material.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity's Material Accounting system states the Output Quantity of Eligible Scrap does not exceed the Input Quantity of Process Scraps. The Entity does not have a plan to sell Process Scraps as an Eligible Scrap.
8.9 Outputs not exceed Inputs	Conformance	The Entity's Material Accounting System has been developed to provide updated information on inventory balance including total output of CoC Materials not exceeding total Input Percentage which conforms to the ASI Chain of Custody Standard requirement. At the

CRITERION	RATING	COMMENT
		time of the audit, there were no examples of effective implementation of the system as there was no sourcing and transfer of CoC Materials.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established a Material Accounting System and the Entity's ASI Mass Balance Process addresses the principle of Internal Overdraws not exceeding 20% defined in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established a Material Accounting System and the Entity's ASI Mass Balance Process states the principle of the Internal Overdraw not exceeding the amount of CoC Material affected by the force majeure situation in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC materials are available in the Entity's supply chain.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a Material Accounting System and the Entity's ASI Mass Balance Process addresses how the Internal Overdraw is made up within the subsequent Material Accounting Period in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
8.11a Positive Balance (carry over)	Conformance	The Entity has established a Material Accounting System and the Entity's ASI Mass Balance Process addresses how to handle the Positive Balance in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
8.11b Positive Balance (expiry)	Conformance	An adequate process has been established to control Positive Balance including carry over in the Entity's ASI Mass Balance Process. The ASI Recording, Reporting and Documentation Process and on-line Material Accounting System is in compliance with ASI Chain of Custody Standard requirements.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has developed a CoC Document which accompanies each shipment and transfer of CoC

CRITERION	RATING	COMMENT
		Material. As sourcing and transfer of CoC Material at the time of the first Certification Audit is not conducted, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2a Date of issue	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes a date of issue for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2b Reference number	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes a reference number linked to the Entity's invoice number for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2c Issuing Entity	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes the issuing Entity information for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2d Receiving customer	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes the receiving Entity information for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2e Responsible employee	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes the Entity's responsible employee for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the

CRITERION	RATING	COMMENT
		effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2f Conformance statement	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes a conformance statement for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2g Type of CoC Material	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes the type of CoC Material for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2h Mass of CoC Material	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC Document includes the mass of CoC Material for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.2i Mass of total material	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issued CoC document includes the mass of total Material for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.3a Sustainability Data (optional)	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity includes Sustainability Data (if requested) in the CoC Document for each shipment of material/product in the template defined in the ASI Chain of Custody Standard. The Sustainability Data is based on the Entity's Life Cycle Assessment Report. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these

CRITERION	RATING	COMMENT
		documents and records will be assessed at the next Surveillance Audit.
9.3b Sustainability Data (passing on)	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity includes Sustainability Data (if requested) in the CoC Document for each shipment of material/product in the template defined in the ASI Chain of Custody Standard. The Sustainability Data is based on the Entity's Life Cycle Assessment Report and annual GHG Emission Report. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issues CoC Documents including the ASI Performance Standard Certification status for the Entity (if requested) for each shipment of material/product in the form defined in ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.4 Supplementary Information (optional)	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the Entity issues CoC Documents including Supplement Information about the Entity or CoC Material (if requested) for each shipment of material/product in the form defined in the ASI Chain of Custody Standard. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.5 Response to verification requests	Conformance	The Entity's ASI Recording, Reporting and Documentation process states the responsibility and process to respond to verification requests for information in the CoC Documents issued by the Entity. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of these documents and records will be assessed at the next Surveillance Audit.
9.6 Error management	Conformance	A process to record errors, analyse the root cause, and to implement corrective actions to prevent the reoccurrence is incorporated in the Entity's ASI Recording, Reporting and Documentation, and Corrective and Preventive Action Procedure. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness

CRITERION	RATING	COMMENT
		of these documents and records will be assessed at the next Surveillance Audit.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity's checking of CoC Documentation and processes addresses the process to verify the required information in the received CoC Documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
10.2 Verify consistency with shipments	Conformance	The Entity's checking of CoC Documentation and processes addresses the process to verify consistency between CoC Documents and accompanied CoC Material or Eligible Scrap in compliance with the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
10.3 Verify supplier CoC Certification status	Conformance	The Entity's checking of CoC Documentation and processes addresses the process to periodically verify the validity and scope of suppliers' ASI CoC Certification in compliance with the ASI Chain of Custody Standard. A valid list of ASI CoC Certified suppliers is maintained. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
10.4 Error management	Conformance	The Entity's Corrective and Preventive Action Procedure states a process to record the errors, analyse the root cause, and take associated correction actions to prevent the reoccurrence with suppliers. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.1b Link to Casthouse Products	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.1c No double counting	Not Applicable	The Criterion is 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	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.

CRITERION	RATING	COMMENT
11.2a Date of issue	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2b Reference number	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2c Issuing Entity	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2d Receiving Entity	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2e Conformance statement	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2f ASI Credits statement	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.2g Quantity	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3b Material Accounting System – purchasing	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3c Expiry	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3d No re-trading	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3e No allocation to physical products	Not Applicable	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
11.3f Verify supplier CoC Certification status	Not Applicable	The Criterion is 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	The Criterion is not applicable as the Entity does not intend to utilise the ASI Market Credits System.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Conformance	The Entity's Claims and Communication process requires all claims and communications shall follow the ASI Claims Guide including communications with the ASI Secretariat. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
12.1b Verifiable evidence	Conformance	The Entity's Claims and Communication process states verifiable evidence to support claims must be



CRITERION	RATING	COMMENT
		kept. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC Materials are available in the Entity's supply chain.
12.1c Employee training	Conformance	The Entity provides relevant employees with the training on Claims and Communication as per the Entity's Claims and Communication process. Records of training provided is maintained.

**Document Control and Version History**

Revision	Date	Notes
0	8 February 2022	Issued - Full Certification