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# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD

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PRESENTED TO

# MA'ADEN ALUMINIUM

CERTIFICATE  
NUMBER

142

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

14 JULY 2021

DATE OF EXPIRY

13 JULY 2024

CERTIFIED SINCE

14 JULY 2021

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  
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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)*

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CERTIFICATION SCOPE

Ma'aden Aluminium includes bauxite mining at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city including alumina refining and smelting as well as casthouses producing ingots, billets and slabs. Also includes aluminium re-melting & manufacturing of flat rolled products.

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

MEMBER NAME	Ma'aden Aluminium
ENTITY NAME	Ma'aden Aluminium
CERTIFICATION SCOPE	Ma'aden Aluminium includes bauxite mining at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city including alumina refining and smelting as well as casthouses producing ingots, billets and slabs. Also includes aluminium re-melting & manufacturing of flat rolled products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Post-Casthouse</li></ul>
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	11 April 2021 – 29 April 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 18 June 2021</li></ul>
AUDIT SCOPE	<p>The audit scope includes all activities at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city, Saudi Arabia, including alumina refining and smelting as well as casthouses producing ingots, billets and slabs, and re-melting &amp; manufacturing of flat rolled products. The audit also included processes performed from Head Office.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li></ul>

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- Casthouses
- Post-Casthouse

All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

At the time of the Audit (April 2021), access to the site at Al-Baitha mine was limited, due to COVID-19 related travel restrictions, however all facilities at the Ras al-Khair industrial city were audited on-site. Therefore, the audit can be considered as a combined desktop and on-site exercise, in accordance with ASI Interim Policy

AUDIT OUTCOME	Certification
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> <li><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.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	14 July 2021 – 13 July 2024
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	14 January 2023
CERTIFICATION NUMBER	142

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is a member of ASI since February 2020 under category of Production and Transformation.
1.2 Management system	Minor Non-Conformance	The Entity has documented procedure for Chain of Custody (CoC) material accounting which has included all applicable requirements of the CoC Standard for the mine, refinery, casthouse and rolling mill as they all have custody of Entity's Chain of Custody Material. The procedure does not provide adequate detail to reflect how each of the requirement is met by the Entity's CoC management system.
1.3 Management system reviews	Conformance	The Entity has defined the requirement to conduct the review of effectiveness of Chain of Custody management system on an annual basis.
1.4 Management representative	Conformance	The Entity has appointed the Central Environment Manager as the management representative having overall responsibility and authority for the Entity's conformance with all applicable requirements of the CoC Standard.
1.5 Training	Conformance	The Entity has established a training module on ASI Chain of Custody (CoC) requirements and conducted training for concerned employees to make them aware of, and to be competent in their responsibilities under the CoC Standard.
1.6 Record keeping	Conformance	The Entity has specified the requirement for the maintenance of records covering all applicable requirements of the CoC Standard in the material accounting and documentation procedure and has specified to retain them for a period of five (5) years. Personnel responsible to maintain the records have been informed about this requirement.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to Input and Output Quantities of Chain of Custody (CoC) Material.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the

CRITERION	RATING	COMMENT
		information to be reported in the procedure including the information related to Input Percentage/s calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of Chain of Custody (CoC) Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to total Input Quantity of eligible scrap, with a breakdown by post-consumer scrap and pre-consumer scrap that is designated as Chain of Custody (CoC) Material supplied directly from a CoC certified Entity, in the calendar year.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to quantity of ASI Aluminium allocated to ASI Credits in the calendar year for their casthouse products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity has specified the requirement to report its Aluminium Stewardship Initiative (ASI) performance within three months after the end of each calendar year. It is recommended to specify the details of the information to be reported in the procedure including the information related to quantity of ASI Credits purchased in the calendar year for their rolling mill products.

CRITERION	RATING	COMMENT
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
2.2a Control of CoC Material	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
2.2b No further outsourcing	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
2.2c Risk assessment	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
2.3 Output Quantity	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
2.4 Verification and record-keeping	Not Applicable	The Entity does not have any outsourcing contractor within the scope that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing. Hence the criteria is not applicable.
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		
3.1a CoC Certification Scope – Bauxite Mining	Conformance	The Entity produces ASI Bauxite from its own Bauxite mine located at Al-Baitha which is within the Entity's Chain of Custody (CoC) Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Conformance	The Entity produces ASI Bauxite from its own bauxite mine located at Al-Baitha, which has been recommended for Certification against the ASI Performance Standard.
3.2a CoC Certification Scope – Alumina Refining	Conformance	The Entity produces ASI Alumina in its own refinery which is within its Chain of Custody (CoC) Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Conformance	The Entity produces Aluminium Stewardship Initiative (ASI) Alumina from its own Alumina refinery which has been recommended for Certification against the ASI Performance Standard.
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	The Entity produces Aluminium Stewardship Initiative (ASI) Liquid Metal in its own Smelter which is within the CoC Certification Scope.

CRITERION	RATING	COMMENT
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	The Entity produces Aluminium Stewardship Initiative (ASI) Liquid Metal in its own Smelter which has been recommended for ASI Performance Standard Certification.

#### 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL

4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity is Re-melting Aluminium in its 'Can Rec' unit which is located in the Rolling mill and which is within the Chain of Custody (CoC) Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity is Re-melting Aluminium in its 'Can Rec' unit which is located in the Rolling mill which has been recommended for the Aluminium Stewardship Initiative (ASI) Performance Standard.
4.2a Pre-Consumer Scrap and Dross	Minor Non-Conformance	The Entity has given a provision in the Material Accounting System to input eligible scrap and non-eligible scrap in the Re-melting process. However the system accounts the pre-consumer scrap coming back from its own customers as eligible scrap even though they are not a Chain of Custody (CoC) Certified Entity.
4.2b Post-Consumer Scrap	Conformance	The Entity receives post-consumer scrap in the form of used beverage cans from various scrap suppliers globally who are subjected to due diligence assessment. The Material Accounting System developed by the Entity considers Eligible Scrap as that coming from suppliers who have undergone this due diligence assessment.
4.3a Supplier records	Conformance	The Entity has a system in place to record the identity, principals and place/s of operation of all direct suppliers of Recyclable Scrap Material. The information is obtained through questionnaire and entered in the Entity's supplier database.
4.3b Cash payments	Conformance	The Entity records all financial transactions with its direct suppliers of Recyclable Scrap material in its financial accounting system. The Entity does not indulge in cash payments for any of the suppliers as all payments are made through bank transfer.

#### 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a CoC Certification Scope – Casthouses	Conformance	The Entity produces Aluminium Stewardship Initiative (ASI) Casthouse products in its own Casthouse which is within the Chain of Custody (CoC) Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity produces ASI Casthouse products in its own Casthouse which has been recommended for ASI Performance Standard certification.

CRITERION	RATING	COMMENT
5.2 Casthouse Products	Conformance	The Entity has a system to identify its casthouse products through unique identification number which includes year of production. This number is either physically stamped on casthouse products or printed on the labels which are placed on the bundle of ingots. This identification number 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 – Post-Casthouse	Conformance	The Entity produces post casthouse products such as Can and body stock coils and Auto sheet coils in its Rolling mill which is within the Chain of Custody (CoC) Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity produces post casthouse products such as Can Body stock coils and Auto sheet coils in its own Rolling Mill which has been recommended for ASI Performance Standard certification.
6.1c Sourcing ASI Aluminium	Minor Non-Conformance	The Entity's Rolling mill produces Aluminium coils from the Aluminium sourced mostly from its own casthouse which is under the scope of Chain of Custody (CoC) Certification. Occasionally it also sources Aluminium slabs from other casthouses which are not ASI CoC certified. The Material Accounting System does not reflect such material as Non eligible input material.

#### 7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has documented its supplier code of conduct which covers anti-corruption. The Supplier code of conduct is communicated to suppliers of Non-Chain of Custody (CoC) Material and recyclable scrap and accepted by them by signing it. The Entity has implemented due diligent questionnaire covering training on anti-corruption for its Non CoC metal suppliers and scrap suppliers.
7.1b Responsible sourcing policy (responsible sourcing)	Minor Non-Conformance	The Entity has documented its supplier code of conduct which covers environment, social and governance factors. The Supplier code of conduct is communicated to suppliers of Non-Chain of Custody (CoC) Material and recyclable scrap and accepted by them. The Entity has also implemented CoC due diligence questionnaire for these suppliers but need to determine the criteria for minimum performance to be achieved by them on the environment, social and governance factors.
7.1c Responsible sourcing policy (human rights due diligence)	Minor Non-Conformance	The Entity has documented its supplier code of conduct which covers human rights due diligence. The Supplier code of conduct is communicated to suppliers of Non-



CRITERION	RATING	COMMENT
		Chain of Custody (CoC) Material and recyclable scrap and accepted by them. The Entity has also implemented CoC due diligence questionnaire for these suppliers but need to determine the criteria for minimum performance to be achieved by them on the human rights due diligence factor.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Minor Non-Conformance	The Entity has established its supplier Code of Conduct covering suppliers of Non-Chain of Custody (CoC) Material and Recyclable Scrap material but it does not include Aluminium Stewardship Initiative Performance Standard (ASI PS) requirement related to conflict affected and high risk areas. The supplier CoC due diligence questionnaire also does not cover this requirement.
7.2 Risk assessment	Minor Non-Conformance	The Entity has developed Chain of Custody (CoC) due diligence questionnaire for its suppliers of Non-CoC Material and recyclable scrap material which has provision to document risk of non-compliance with its responsible sourcing policy and mitigation actions. The information on risks is not updated for some of the scrap metal suppliers and the findings are not documented to undertake mitigation actions.
7.3 Complaints mechanism	Conformance	The Entity has established whistle blowing policy for its stakeholders which is appropriate to the nature and scale of the Entity's business. Any stakeholder in the Aluminium supply chain can raise complaint regarding non-compliance to the Entity's responsible sourcing policy. The system is available through the group website which has provided toll free number and the email address for raising any complaint.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has developed a Material Accounting System capturing data related to input quantity and output quantity of Chain of Custody (CoC) Material and Non-CoC Material by mass. The material movement from the Bauxite Mine to the Refinery, Refinery to Smelter, Smelter to Casthouse and Casthouse to Rolling Mill is reflected in the system.
8.2a Post-Consumer Scrap	Conformance	The Entity's Chain of Custody (CoC) material Accounting system records the input quantity of the post-consumer scrap in the form of used beverage Cans. Both eligible and non-eligible UBC scrap are reflected in the system.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's Chain of Custody (CoC) Material Accounting System records the total input quantity of the pre consumer scrap which is recorded in the form of Class 1,

CRITERION	RATING	COMMENT
		Class 2, Class 3 and Class 4 scrap. The CoC Material accounting and documentation procedure may provide explanation of these different classes of pre consumer scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity's Chain of Custody (CoC) Material Accounting System records the total input quantity of eligible pre-consumer scrap in the form of Class 1, Class 2, Class 3 and Class 4 scrap.
8.3 Material Accounting Period	Conformance	The Entity has determined the calendar year as the material accounting period for Chain of Custody (CoC) material accounting which is reflected in the material accounting sheet. The Entity may specify this in the procedure for Material accounting and documentation.
8.4 Input Percentage	Conformance	The Entity has calculated the input percentage of the Chain of Custody (CoC) material in their Material Accounting System using the formula given in the ASI CoC standard for Refinery, Smelter, Casthouse and Rolling mill. For the mine, the Entity has considered 100% input material as Chain of Custody Material. For the can reclamation unit the criteria does not apply because the unit re-melts scrap material.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity's Material Accounting System has considered the input percentage for its Can Reclamation unit which re-melts scrap Aluminium using the formula as given in the CoC Standard.
8.6 Output Quantity determination	Conformance	The Entity's material accounting sheet has considered the input percentage of Chain of Custody (CoC) Material in the formula to calculate the output quantity of CoC Material by mass for the Mine, Refinery, Smelter, Cast House and Rolling Mill.
8.7 Output Quantity designation	Conformance	The Entity's material accounting system designates the output quantity of Chain of Custody (CoC) Material as 100% CoC.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity does not send the scrap generated in the Rolling Mill to another CoC facility. The scrap is processed in its own Casthouse and the internal material accounting system considers the output quantity of this scrap as eligible scrap based on the input percentage.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System has considered the same percentage for calculating the total output of Chain of Custody (CoC) Material and/or eligible scrap as the input percentage applied to total input of CoC

CRITERION	RATING	COMMENT
		Material and/or Eligible Scrap over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Minor Non-Conformance	The Entity is not under any contract for delivery of Chain of Custody (CoC) Material to an Entity within a given Material Accounting Period. However the Entity's Material Accounting System needs to define the controls for carrying over an Internal Overdraw to the subsequent Material Accounting Period if needed due to force majeure condition to restrict the internal overdraw to maximum 20% of the input quantity of the CoC Material.
8.10b Internal Overdraws (not exceed affected amount)	Minor Non-Conformance	The Entity is not under any contract for delivery of Chain of Custody (CoC) Material to an Entity within a given Material Accounting Period. However the Entity's Material Accounting System needs to define the controls for carrying over an Internal Overdraw to the subsequent Material Accounting Period if needed due to force majeure condition to restrict the internal overdraw to the amount of CoC Material affected by such force majeure situation.
8.10c Internal Overdraws (period to make up)	Minor Non-Conformance	The Entity is not under any contract for delivery of Chain of Custody (CoC) Material to an Entity within a given Material Accounting Period. However the Entity's Material Accounting System needs to define the controls to ensure that if required then Internal Overdraw during the previous Material Accounting Period is made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Minor Non-Conformance	The Entity has reflected the positive balance material at the end of each accounting period in the Material Accounting System. However the procedure for material accounting and documentation has not covered this process.
8.11b Positive Balance (expiry)	Conformance	The Entity demonstrated a good understanding of the requirement of expiry of positive balance of output Chain of Custody (CoC) Material generated in one Material Accounting Period if not drawn down during the subsequent Material Accounting Period and confirmed to follow the same. The Entity is advised to document this requirement in their CoC Material Accounting and documentation procedure.
<b>9 ISSUING COC DOCUMENTS</b>		
9.1 Shipments and transfers	Conformance	The Entity has defined the requirement in their Chain of Custody (CoC) Material handling and documentation procedure to accompany a CoC certificate with each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Outsourcing Contractors. The

CRITERION	RATING	COMMENT
		format for the CoC certificate has been developed and requirement communicated to concerned employees.
9.2a Date of issue	Conformance	The Entity has a documented Chain of Custody (CoC) document which references the date of issue of the document.
9.2b Reference number	Minor Non-Conformance	The Entity has documented format for the Chain of Custody (CoC) Certificate which has unique reference number but it is not linked to the Entity's Material Accounting System for verification purposes. The CoC Material accounting and documentation procedure does not provide any guidance how this linkage will be established.
9.2c Issuing Entity	Conformance	The Entity has a documented format for the Chain of Custody certificate which include the details of name of Entity, address of Entity and Certificate number.
9.2d Receiving customer	Conformance	The Entity has developed a format of Chain of Custody (CoC) Certificate which includes the information related to Name, Address and CoC certificate number of the customer receiving the CoC Material.
9.2e Responsible employee	Conformance	The Entity has a documented format for the Chain of Custody (CoC) Certificate which includes the name of the responsible employee of the Entity who will verify information in the CoC Certificate. The responsible employee/s is/are yet to be nominated.
9.2f Conformance statement	Conformance	The Entity has a documented format for the Chain of Custody (CoC) Certificate which includes a statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard."
9.2g Type of CoC Material	Conformance	The Entity has a documented format for the Chain of Custody (CoC) Certificate which includes the type of CoC Material in the shipment. The type of materials include ASI Bauxite, ASI Alumina, ASI Liquid metal, ASI cold metal and ASI Aluminium.
9.2h Mass of CoC Material	Conformance	The Entity has a documented format for the Chain of Custody (CoC) Certificate which include the information regarding weight of the CoC Material and its unit.
9.2i Mass of total material	Conformance	The Entity has a documented format for the Chain of Custody (CoC) Certificate which include the information regarding total weight of the material and its unit of measurement.

CRITERION	RATING	COMMENT
9.3a Sustainability Data (optional)	Minor Non-Conformance	The Entity has decided to include the applicable Sustainability Data in the Chain of Custody (CoC) Certificate for its Refinery, Smelter and Casthouse CoC Material and developed format for the same. The Entity is yet to develop the process of compiling the Greenhouse Gas (GHG) data for the purpose of reporting in the CoC certificate.
9.3b Sustainability Data (passing on)	Minor Non-Conformance	The Entity has decided to include the applicable Sustainability Data in the Chain of Custody (CoC) Certificate for its Post-Casthouse products and has developed format for the same. The Entity is yet to develop the process of compiling the Greenhouse Gas (GHG) data for the purpose of reporting in the CoC certificate.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has developed a format for Chain of Custody (CoC) certificate for its Rolling Mill CoC Material which includes the information on Aluminium Stewardship Initiative Performance Standard (ASI PS) Certification status.
9.4 Supplementary Information (optional)	Conformance	The Entity has decided to provide the Sustainability information in the Chain of Custody certificate. The Entity has maintained the records of GHG emissions and hence the information can be supported by objective evidence.
9.5 Response to verification requests	Minor Non-Conformance	The Entity has a system to review and respond to customer requests regarding products and services as part of its Quality Management System. The Entity has drafted the specific process of handling requests for verification of Chain of Custody (CoC) document in its CoC Manual but the same is yet to be approved.
9.6 Error management	Minor Non-Conformance	The Entity has a process to document Corrective actions for any non-conformance found within the scope of its Quality Management System. The Entity is in the process of developing specific process within its Chain of Custody system for recording errors discovered after the CoC Material has been shipped including the steps to correct it and actions taken to avoid its recurrence but the same is not yet approved and issued.
<b>10 RECEIVING COC DOCUMENTS</b>		
10.1 Verify required information included	Minor Non-Conformance	The Entity does not receive any Chain of Custody (CoC) document at present. The Entity has trained personnel on the requirement to verify the information in CoC document received from other certified CoC Entities but the Entity has not designated the person to verify this information in its procedure for material accounting and documentation.

CRITERION	RATING	COMMENT
10.2 Verify consistency with shipments	Minor Non-Conformance	The Entity does not receive any Chain of Custody (CoC) document at present. The Entity has trained personnel on the requirement to verify the consistency of information in CoC document to the CoC Material received from other CoC certified Entities but the Entity has not designated the person to verify this information in its procedure for material accounting and documentation.
10.3 Verify supplier CoC Certification status	Minor Non-Conformance	The Entity does not receive any material from the Chain of Custody (CoC) certified facility currently. The Entity has trained various personnel on the requirements of CoC standard including the requirement to verify the CoC Certification status of the supplier if required in future. The Entity has not designated the person responsible for this activity and has not determined the frequency of this check in the material accounting and documentation procedure.
10.4 Error management	Minor Non-Conformance	The Entity has a documented process to verify the products and services supplier by suppliers and to document corrective actions in case of any non-compliances. The Entity has drafted a specific procedure to record errors discovered in the Chain of Custody (CoC) document after CoC Material or eligible scrap has been received from supplier but the same is yet to be approved and issued. The procedure also specifies the agreed steps taken to correct it, and actions implemented to avoid a recurrence.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.1b Link to Casthouse Products	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.1c No double counting	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.1d No Positive Balance for ASI Credits	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2a Date of issue	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.

CRITERION	RATING	COMMENT
11.2b Reference number	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2c Issuing Entity	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2d Receiving Entity	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2e Conformance statement	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2f ASI Credits statement	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.2g Quantity	Not Applicable	The Entity does not intend to allocate excess ASI Aluminium to ASI Credits and hence this criteria does not apply.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3b Material Accounting System – purchasing	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3c Expiry	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3d No re-trading	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3e No allocation to physical products	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3f Verify supplier CoC Certification status	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	The Entity does not intend to purchase ASI Credits and hence this criteria does not apply.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Minor Non-Conformance	The Entity does not intend to make claims and/or representations about Chain of Custody (CoC) Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates as most of the inputs are CoC

CRITERION	RATING	COMMENT
		inputs. The Entity however has not mentioned this in their procedure for material accounting and documentation.
12.1b Verifiable evidence	Minor Non-Conformance	The Entity does not intend to make claims and/or representations about Chain of Custody (CoC) Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates as most of the inputs are CoC inputs. The Entity however has not mentioned this in their procedure for material accounting and documentation.
12.1c Employee training	Minor Non-Conformance	The Entity does not intend to make claims and/or representations about Chain of Custody (CoC) Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates as most of the inputs are CoC inputs. The Entity however has not mentioned this in their procedure for material accounting and documentation. The Entity has trained various personnel on the CoC standard requirements.

Revision	Date	Notes
0	14 July 2021	Initial Certification Audit – Full Certification