

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ELVAL HELLENIC ALUMINIUM INDUSTRY

CERTIFICATE
NUMBER

150

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

9 AUGUST 2021

DATE OF EXPIRY

8 AUGUST 2024

CERTIFIED SINCE

9 AUGUST 2021

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark grey background.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Aluminium Rolling Division of Elvalhacor S.A. for
the facility in Oinofyta, Greece, covering its Re-
melting & Casthouse Facilities, Hot/Cold Rolling,
Coil Coating and Finishing Lines.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	ELVAL Hellenic Aluminium Industry
ENTITY NAME	ELVALHALCOR S.A. - Aluminium Rolling Division
CERTIFICATION SCOPE	Aluminium Rolling Division of Elvalhalcor S.A. for the facility in Oinofyta, Greece, covering its Re-melting & Casthouse Facilities, Hot/Cold Rolling, Coil Coating and Finishing Lines.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	30 June 2021 – 1 July 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 21 July 2021
AUDIT SCOPE	<p>The audit scope includes all activities at the: Re-melting & Casthouse operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging at the Oinofyta site..</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the Audit (July 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits,</p>

Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION
PERIOD

9 August 2021 – 8 August 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

8 February 2023

CERTIFICATION
NUMBER

150

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Communications from the ASI Secretariat confirms that Elval is a current member and in good standing.
1.2 Management system	Conformance	A dedicated Management System has been developed by the Entity for the implementation of the ASI Chain of Custody Standard.
1.3 Management system reviews	Conformance	The Entity includes a periodic review procedure in its documentation which determines the scope of the review, personnel involved and provides the objectives of the review.
1.4 Management representative	Conformance	The Entity has provided evidence to confirm it has nominated one Management Representative as having overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity has implemented a training program to cover all aspects of the Chain of Custody standard to ensure relevant personnel are aware of and competent in their responsibilities under the Chain of Custody Standard. The training program is available to all relevant personnel. Training records are maintained.
1.6 Record keeping	Conformance	All records are securely stored on the Elval Enterprise Resource Planning system. The five year records retention requirement is fulfilled.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The readiness of the Material Accounting System to produce reports was confirmed during the audit, however, as no reporting is completed until after a full year of the accounting period is completed, once certified, this criterion is Not Applicable.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in Chain of Custody Certification Scope	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
2.2a Control of Chain of Custody Material	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
2.2c Risk assessment	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
2.3 Output Quantity	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
2.4 Verification and record-keeping	Not Applicable	Not Applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a Chain of Custody Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a Chain of Custody 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 Chain of Custody 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 Chain of Custody Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity operates its own Remelting / Casthouse facilities, no liquid metal comes from any other facility.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity's ASI Performance Standard Certification (Certificate 82) confirms the scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity uses its SAP system to account for all incoming materials, including ASI Eligible Scrap. Pre-Consumer Scrap is checked that it is designated as Chain of Custody Material supplied directly from a Chain of Custody Certified Entity or Aluminium recovered from Dross and treated Dross residues that is subject to supplier due diligence as per Section 7. Controls are in place to ensure input information is valid.
4.2b Post-Consumer Scrap	Conformance	The Entity accounts for Eligible Scrap in their Material Accounting System including Post-Consumer Scrap that is subject to supplier due diligence as per Section 7 and is assessed by the Entity to be post-consumer in origin.
4.3a Supplier records	Conformance	The Entity has systems in place to record the identity, principals and place/s of operation of all direct suppliers of Recyclable Scrap Material. This is integrated into its ERP system and approved supplier process.
4.3b Cash payments	Not Applicable	The Entity does not make any payments in cash.

5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

CRITERION	RATING	COMMENT
5.1a Chain of Custody Certification Scope – Casthouses	Conformance	The Entity's certification scope includes its Casthouse; No other Casthouse is used as a production facility within the certification scope of the Entity.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity's ASI Performance Standard Certification (Certificate 82) confirms the scope.
5.2 Casthouse Products	Conformance	The Entity uses a bar code system in place to ensure that unique identification numbers are physically printed on slabs or written on rolls for all Aluminium produced including ASI aluminium. This can be linked to the Input Quantity of Chain of Custody Material for that Material Accounting Period. Every slab and roll is identified and in the SAP system.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Chain of Custody Certification Scope – Post-Casthouse	Conformance	Post-Casthouse products are only produced within the Entity and all facilities are included in its Chain of Custody Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity's ASI Performance Standard Certification Scope includes all Post-Casthouse operations.
6.1c Sourcing ASI Aluminium	Conformance	The Entity's Material Accounting Systems within SAP is in place to ensure that eligible Aluminium and associated Chain of Custody Documentation can be tracked on all incoming shipments and through the Casthouse to Post-casthouse products.
7 DUE DILIGENCE FOR NON-CHAIN OF CUSTODY INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has issued a Supplier Code of Conduct, which is available for view/download from: https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf Section 1 of the document presents the Entity's policy on Business ethics and anti-corruption. The document is available both in the Greek and English language.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has issued a Supplier Code of Conduct, which is available for view/download from: https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf The document communicates the Entity's policy and expectations on Responsible Sourcing. The document is available both in the Greek and English language.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has issued a Supplier Code of Conduct, which is available for view/download from:

CRITERION	RATING	COMMENT
		https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf Section 2 of the document presents the Entity's requirement on the protection of Human Rights. The document is available both in the Greek and English language.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has issued a Supplier Code of Conduct, which is available for view/download from: https://www.elval.com/arxeia/brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf Section 2 of the document presents the Entity's policy on Conflict Minerals and High Risk areas.
7.2 Risk assessment	Conformance	The Entity conducts due diligence with its suppliers of Non-Chain of Custody Material and Recyclable Scrap Material to assess the risks of non-compliance with its responsible sourcing policy. It documents the findings and so far has not identified any high risk supplier, however it has a procedure in place to undertake measurable risk mitigation where risks of adverse impacts are identified.
7.3 Complaints mechanism	Conformance	All stakeholders have the means to raise grievances to the Entity, with employees able to raise these anonymously or not. The Chain of Custody Document also presents the name of the Responsible Person that is assigned with the responsibility to collect all concerns from customer or suppliers of Chain of Custody material, where all contact info is publicly available on the Elval web site. This Criterion has been positively evaluated for its conformance under Criterion 3.2 of the Performance Standard.
8 MASS BALANCE SYSTEM: CHAIN OF CUSTODY MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System based on its SAP system. The specification and its manual fully describe the functionality of the system and its use. The processes are documented but have been tested with dummy and/or outdated data. When actual ASI material is received the system is to be checked based on actual material flows.
8.2a Post-Consumer Scrap	Conformance	The Entity's Material Accounting System is able to determine the input Quantity of Pre and Post-Consumer Scrap. When actual ASI Chain of Custody Material is received the system should be checked based on actual material flows.

CRITERION	RATING	COMMENT
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's Material Accounting System is able to determine the input Quantity of Pre and Post-Consumer Scrap. When actual ASI Chain of Custody Material is received the system should be checked based on actual material flows.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has developed the "ASI Chain of Custody Management System", where the chapter related to "Material Accounting System" (MAS) maintains an important role. MAS developed by the Entity is able to meet the relevant criteria requirements, providing an accounting system of material able to determine the input Quantity of Pre and Post-Consumer Scrap, as the Chain of Custody mass balance system ordains. It is underlined that, when actual ASI Chain of Custody Material is received by the Entity, the system should be checked based on actual material flows.
8.3 Material Accounting Period	Conformance	The Entity has developed the "ASI Chain of Custody Management System", where the chapter related to "Material Accounting System" (MAS) maintains an important role. According to the "Material Accounting System Manual", the Material Accounting Period is set to one (1) calendar year.
8.4 Input Percentage	Conformance	The Material Accounting System (MAS) developed by the Entity provides an accounting system that can determine the input percentage of ASI Chain of Custody Material. When actual ASI Chain of Custody Material is received by the Entity, the system should be checked based on actual Material flows.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	The Entity does not operate a facility for re-melting of recyclable scrap only. Re-melting takes place using both recyclable and primary material as well as alloying elements. The process model includes all of the Entity's operations as a single entity and no separate assessment for the input percentage was made (one input percentage for the whole entity is calculated as used) as agreed with ASI. Therefore this criteria has been rated as Not Applicable.
8.6 Output Quantity determination	Conformance	The Entity has developed the "ASI Chain of Custody Management System", where the chapter related to "Material Accounting System" (MAS) maintains an important role. The MAS developed by the Entity is able to meet the relevant criteria requirements, providing an accounting system of material able to determine the output Quantity based on the operation of SAP. When actual ASI Chain of Custody Material is received by the

CRITERION	RATING	COMMENT
		Entity the system should be checked based on actual material flows.
8.7 Output Quantity designation	Conformance	The Entity has developed the “ASI Chain of Custody Management System”, where the chapter related to “Material Accounting System” (MAS) maintains an important role. The Material Accounting System is based on a Mass Balance Approach, where only inputs and outputs are being monitored. The MAS developed by the Entity is able to meet the relevant criteria requirements, providing an accounting system of material able to designate the output Quantity as 100% Chain of Custody Material, based on the use of SAP. However, it is underlined that, when actual ASI Chain of Custody Material is received by the Entity, the system should be checked based on actual material flows.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	The Entity does not wish to make use of this option. The internal scrap is recycled back into the system on a closed loop fashion. Therefore this criteria has been rated as Not Applicable.
8.9 Outputs not exceed inputs	Conformance	The Entity has developed the “ASI Chain of Custody Management System”, including a “Material Accounting System” (MAS). MAS developed by the Entity is able to meet the relevant criteria requirements, providing an accounting system of material able to determine the input and output Quantity and ensure that the total output of Chain of Custody Material does not proportionally exceed the Input Percentage as applied to total input of Chain of Custody Material, based on the SAP operation. It is underlined that, when actual ASI Chain of Custody Material is received by the Entity, the system should be checked based on actual material flows.
8.10a Internal Overdraws (not exceed 20%)	Not Applicable	The Entity does not wish to make use of this option and as such has not made provision for overdraws.
8.10b Internal Overdraws (not exceed affected amount)	Not Applicable	The Entity does not wish to make use of this option. Therefore this Criterion is Not Applicable.
8.10c Internal Overdraws (period to make up)	Not Applicable	The Entity does not wish to make use of this option. Therefore this Criterion is Not Applicable.
8.11a Positive Balance (carry over)	Conformance	The Entity has developed the “ASI Chain of Custody Management System”. The “Material Accounting System” (MAS) The MAS developed by the Entity provides an accounting system that can identify any carry over of a Positive Balance, based on the SAP operation. However, it must be underlined that, when actual ASI Chain of

CRITERION	RATING	COMMENT
		Custody Material is received by the Entity, the system should be checked based on actual material flows.
8.11b Positive Balance (expiry)	Conformance	The Entity has developed the "ASI Chain of Custody Management System". The "Material Accounting System" (MAS) The MAS developed by the Entity provides an accounting system that can identify any carry over of a Positive Balance, based on the SAP operation. The positive balance is only transferred to the following material accounting period, where, if not consumed, it expires at the end of it. This control is manual, assured by the ASI Coordinator at the end of each Material Accounting Period. When actual ASI Chain of Custody Material is received by the Entity, the system should be checked based on actual material flows.
9 ISSUING CHAIN OF CUSTODY DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has integrated its ASI documentation system into the company's SAP system. A range of controls ensures that a Chain of Custody Document is prepared accurately to accompany each shipment or transfer of ASI Chain of Custody Material dispatched to other Chain of Custody Certified Entities. The documents are sent electronically by the sales manager and can be printed. The process is automated to reduce chances of error.
9.2a Date of issue	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2b Reference number	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI

CRITERION	RATING	COMMENT
		'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2c Issuing Entity	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2d Receiving customer	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2e Responsible employee	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2f Conformance statement	Conformance	The Entity's Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number,

CRITERION	RATING	COMMENT
		<p>contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity’s ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.</p>
9.2g Type of Chain of Custody Material	Conformance	<p>The Entity’s Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity’s ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.</p>
9.2h Mass of Chain of Custody Material	Conformance	<p>The Entity’s Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via the Entity’s ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.</p>
9.2i Mass of total material	Conformance	<p>The Entity’s Chain of Custody document contains; Date, Reference to material accounting system, Entity of production, ASI certification number (space available but not shown at time of audit as not yet certified), receiving customer name, address and ASI certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, mass of material, mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via the Entity’s ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.</p>

CRITERION	RATING	COMMENT
9.3a Sustainability Data (optional)	Not Applicable	The Entity does not wish to make use of this option to include other data with the Chain of Custody document. It publishes an annual Sustainability Report which contains information about other sustainability metrics including greenhouse gas emissions. It also has an LCA available.
9.3b Sustainability Data (passing on)	Not Applicable	The Entity does not wish to make use of this option to include other data with the Chain of Custody document. It publishes an annual Sustainability Report which contains information about other sustainability metrics including greenhouse gas emissions. It also has an LCA available.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity's certification status is presented on the ASI's website at https://aluminium-stewardship.org/about-asi/asi-members/elval/ This link is also present on the Chain of Custody Document that is issued by the Entity.
9.4 Supplementary Information (optional)	Not Applicable	The Entity does not wish to include supplementary information on the Chain of Custody Document as it provides suitable information in its Sustainability Report https://www.elval.com/en/sustainability-csr-reports and via account managers. Therefore this criterion is Not Applicable.
9.5 Response to verification requests	Conformance	The Entity operates a procedure which includes a flow chart and guidance to establish and confirm what is a 'reasonable request' and 6 scenarios of verification requests, e.g. verification of Chain of Custody quantity - via documentation and then through desktop review and then through audit. Other requests are answered by nature of having been in scope of the audit through the ASI certification process and the ASI certificate is provided as proof of this, e.g. of a Material Accounting System.
9.6 Error management	Conformance	The Entity has an error management procedure that could relate to incoming or outgoing ASI Chain of Custody Material and this is documented in the transfer of materials procedure. The flow chart shows error identification, root cause analysis and there is an error log and form for completion. As the system is automated then the risk of error is very low. This system is established for this eventuality.
10 RECEIVING CHAIN OF CUSTODY DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has training documentation which provides detailed instructions of all the information requirements, where to find it on the document and where to register it

CRITERION	RATING	COMMENT
		on the system. This was checked during interview with relevant personnel.
10.2 Verify consistency with shipments	Conformance	The Entity's goods receiving personnel verify the consistency of received Chain of Custody Documents with the accompanying Chain of Custody Material or Eligible Scrap and for recording information in their Material Accounting System. The process is managed by the Recycling Department and inspections on the properties of the incoming material are carried out on site by the scrap yard supervisor and on the registration of the material by the Goods Receipt Officers, who liaise with the Metals Department for the resolution of any issue identified.
10.3 Verify supplier Chain of Custody Certification status	Conformance	The Entity's responsible person checks the ASI website on a regular basis to verify the validity and scope of the supplier's ASI Chain of Custody Certification for any changes that might affect the status of the supplied Chain of Custody Material or Eligible Scrap.
10.4 Error management	Conformance	The Entity has implemented a procedure to be followed on the occasion of errors identified, either on incoming or outgoing Chain of Custody material. All errors are reported in the Error Documentation Form, which also provides room for root cause analysis and corrective actions documentation and follow-up.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.1b Link to Casthouse Products	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.1c No double counting	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.1d No Positive Balance for ASI Credits	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2a Date of issue	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2b Reference number	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2c Issuing Entity	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System

CRITERION	RATING	COMMENT
11.2d Receiving Entity	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2e Conformance statement	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2f ASI Credits statement	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.2g Quantity	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3a Chain of Custody Certification Scope – purchasing ASI Credits	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3b Material Accounting System – purchasing	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3c Expiry	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3d No re-trading	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3e No allocation to physical products	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3f Verify supplier Chain of Custody Certification status	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not Applicable as the Entity will not be engaged with the Market Credit System
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has developed a dedicated procedure which prescribes the way that claims are made, in line with the ASI Claims Guide, an assurance mechanism and the way that cases of misconduct are reported to ASI. Based on that, all claims have to be approved by the ASI Coordinator who is assigned with the responsibility to apply the ASI Claims Guide and liaise with ASI, if needed, using the form.
12.1b Verifiable evidence	Conformance	The Entity has developed a dedicated procedure which prescribes the way that claims are made, in line with the ASI Claims Guide, an assurance mechanism and the way that cases of misconduct are reported to ASI. Based on that, all claims have to be approved by the ASI Coordinator who is assigned with the responsibility to

CRITERION	RATING	COMMENT
		apply the ASI Claims Guide and liaise with ASI, if needed.
12.1c Employee training	Conformance	The Entity has a range of materials and a specific training session on communications and claims. The audit confirmed that appropriate training has been provided for relevant employees to properly understand and communicate the claims and/or representations relating to ASI.

Revision	Date	Notes
0	9 August 2021	Initial Certification Audit – Full Certification