# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# HYDRO ALUMINIUM EXTRUDED SOLUTIONS

CERTIFICATE NUMBER

80

ASI STANDARD

CHAIN OF CUSTODY (V1 2017)

CERTIFICATION LEVEL

FULL CERTIFICATION ASI ACCREDITED AUDITOR

DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE
7 APRIL 2020

DATE OF EXPIRY

6 APRIL 2023

CERTIFIED SINCE
7 APRIL 2020

AUTHORISED BY

The \_\_\_

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

www.aluminium-stewardship.org

### CERTIFICATION SCOPE

Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope cover the Hydro sites: Avintes (Portugal), Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Łódź (Poland), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Rackwitz (extrusion) (Germany), Székesfehérvár (Hungary), Tibshelf (UK), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Trzcianka (Poland) and Uphusen (Germany).

# SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

## **OVERVIEW**

Hydro
Hydro Aluminium Extruded Solutions
Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope cover the Hydro sites: Avintes (Portugal), Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Łódź (Poland), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Rackwitz (extrusion) (Germany), Székesfehérvár (Hungary), Tibshelf (UK), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Trzcianka (Poland) and Uphusen (Germany).
Aluminium Re-melting/Refining
Casthouses
Post-Casthouse
Chain of Custody Standard V1
<ul> <li>First Certification Audit (12 November 2019 – 24 January 2020)</li> </ul>
<ul> <li>Scope Change Audit (5 – 6 May 2020)</li> </ul>
<ul> <li>Scope Change Audit (18 – 19 June 2020)</li> </ul>
<ul> <li>Scope Change Audit (17 – 21 August 2020)</li> </ul>
<ul> <li>Scope Change Audit (12 November 2020)</li> </ul>
<ul> <li>Scope Change Audit (7 December 2020)</li> </ul>
<ul> <li>Scope Change Audit (20 January 2021)</li> </ul>
<ul> <li>Surveillance Audit (27 April – 3 June 2021)</li> </ul>
<ul> <li>Scope Change Audit (6 - 9 July 2021)</li> </ul>
DNV Business Assurance Services UK Ltd.
12 November 2019 – 24 January 2020 (Certification Audit)
<ul> <li>5 – 6 May 2020 (Scope Change Audit)</li> </ul>
<ul> <li>18 – 19 June 2020 (Scope Change Audit)</li> </ul>
17 – 21 August 2020 (Scope Change Audit)
12 November 2020 (Scope Change Audit)

- 7 December 2020 (Scope Change Audit)
- 20 January 2021 (Scope Change Audit)
- 27 April 3 June 2021 (Surveillance Audit)
- 6 9 July 2021 (Scope Change Audit)

### AUDIT REPORT SUBMISSION

- 4 April 2020 (Certification Audit)
- 8 July 2020 (Scope Change Audit)
- 31 August 2020 (Scope Change Audit)
- 25 September 2020 (Scope Change Audit)
- 3 December 2020 (Scope Change Audit)
- 26 January 2021 (Scope Change Audit)
- 10 February 2021 (Scope Change Audit)
- 28 June 2021 (Surveillance Audit)
- 1 August 2021 (Scope Change Audit)

### AUDIT SCOPE

### <u>Initial Certification Audit (12 November 2019 – 24 January 2020)</u>

The audit scope covered the activities at the Hydro sites: Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), Tibshelf (UK), Tønder Precision Tubing (Denmark) and Trzcianka (Poland).

Supply chain activities included in the audit scope:

- Casthouses
- Post-Casthouse

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

### First Scope Change Audit (5 – 6 May 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Łódź (Poland).

Supply chain activities included in the audit scope:

Post-Casthouse

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

At the time of the audit (May 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

### Second Scope Change Audit (18 – 19 June 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Székesfehérvár (Hungary).

Supply chain activities included in the audit scope:

Post-Casthouse

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

At the time of the audit (June 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

### Third Scope Change Audit (17 – 21 August 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Nenzing (Austria).

Supply chain activities included in the audit scope:

Post-Casthouse

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

### Fourth Scope Change Audit (12 November 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Tønder Extrusion (Denmark).

Supply chain activities included in the audit scope:

Post-Casthouse

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

### Fifth Scope Change Audit (7 December 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Offenberg (Germany).

Supply chain activities included in the audit scope:

Post-Casthouse

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

### Sixth Scope Change Audit (20 January 2021)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Rackwitz (extrusion) (Germany) and Uphusen (Germany).

Supply chain activities included in the audit scope:

Post-Casthouse

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

At the time of the audit (January 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 the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

### Surveillance Audit (27 April – 3 June 2021)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Cheltenham (UK), Tibshelf (UK) and Tønder Precision Tubing (Denmark).

Supply chain activities included in the audit scope:

Casthouses

### Post-Casthouse

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

At the time of the audit (April - June 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 the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

### Seventh Scope Change Audit (6 – 9 July 2021)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions Iberia sites Avintes (Portugal) and La Roca, La Selva and Navarra (Spain).

As a Multi-Site Organisation, the ASI multi-site sampling approach was undertaken with the Avintes and La Roca sites not visited but were audited as part of the Head Office Chain of Custody related activities.

The supply chain activity Aluminium Re-melting/Refining has been added as part of the Scope Change Audit.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- 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 (July 2021), access to the La Selva site was not possible, due to COVID-19 related travel restrictions. The La Selva audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY	The Auditors confirm that:
DECLARATION	☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
	The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
	The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	7 April 2020 – 6 April 2023
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	6 April 2023

# SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES			
1.1 ASI membership	Conformance	The Entity is an ASI Member committed to comply with ASI's membership obligations and the ASI complaints mechanism. The Entity holds certification for the ASI Performance Standard as well.	
1.2 Management system	Conformance	The Entity has created a management system that addresses all applicable requirements of the ASI Chain of Custody Standard. An ASI Management System document is developed. The document describes in detail the management system, purpose, scope, responsibilities, functions, management, management reviews, corrective and preventative measures and documentation and record retention, which gives governance of the CoC system.	
1.3 Management system reviews	Conformance	The Entity has created a management system that addresses all applicable requirements of the ASI Chain of Custody Standard. An ASI Management System document is developed. The document describes in detail the management system, purpose, scope, responsibilities, functions, management, management reviews, corrective and preventative measures and documentation and record retention, which gives governance of the CoC system.	
1.4 Management representative	Conformance	The Entity has appointed a member of management as the responsible person for ASI Chain of Custody Standard implementation and defined a chart of responsibilities for different tasks through the organization.	
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard.	
1.6 Record keeping	Conformance	The Entity maintains up-to-date records (Management System) covering all applicable requirements of the ASI Chain of Custody Standard.	
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity's operating procedure specified that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.	

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity's operating procedure specified that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity's operating procedure specified that the Entity will report Positive Balance of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity's operating procedure specified that the Entity will report any Internal Overdraw of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity's operating procedure specified that the Entity will report on total Input Quantities of Eligible Scrap to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity will not engage in purchasing/selling credits.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity will not engage in purchasing/selling credits.
2 OUTSOURCING CONTRACT	ORS	
2.1 Outsourcing Contractors in CoC Certification Scope	Conformance	The Entity has identified all applicable Outsourced Contractors in their Certification Scope.
2.2a Control of CoC Material	Conformance	The Entity has established procedures and tools to govern and control ownership of CoC Material used by outsourcing partners.
2.2b No further outsourcing	Conformance	The Entity has established procedures and tools to govern and control ownership of CoC Material used by outsourcing partners.
2.2c Risk assessment	Conformance	The Entity has assessed the risk of potential non-conformance with the ASI Chain of Custody Standard resulting from the engagement of each Outsourcing Contractor. The CoC Management System includes relevant guidelines and procedures – e.g. due diligence procedure, procurement risk assessment tools and supplier risk assessment tools.
2.3 Output Quantity	Conformance	The Entity has processes to ensure that the Outsourcing Contractor provides information on

CRITERION	RATING	COMMENT
		Output Quantity of CoC Material to the Entity at the conclusion of the Entity's Material Accounting Period.
2.4 Verification and record- keeping	Conformance	The Entity has processes to verify that the output quantity of CoC Material is consistent with the input quantity of CoC Material provided to the outsourcing contractor and records it in its Material Accounting System.
2.5 Error management	Conformance	The Entity has processes to verify that if error is discovered after CoC Material has been shipped, the Entity and the outsourcing contractor shall document the error and the agreed steps taken to correct it and implement actions to avoid a recurrence.
3 PRIMARY ALUMINIUM: CRI METAL	TERIA FOR AS	I BAUXITE, ASI ALUMINA AND ASI LIQUID
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: CR	ITERIA FOR EL	IGIBLE SCRAP AND ASI LIQUID METAL
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Remelting/Refining to produce recycled Aluminium. The production sites are inside the scope of the ASI Chain of Custody Certification Scope.
4.1b ASI Performance Standard  – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Remelting/Refining to produce recycled Aluminium. The production sites are inside the scope of the ASI Chain of Custody Certification Scope and certified against the ASI Performance Standard.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has procedures and policies stating that it will only use certified material for re-melting/refining to complement the annual output of ASI Material.
4.2b Post-Consumer Scrap	Conformance	The Entity has established procedures and an accounting system to govern the qualification of

CRITERION	RATING	COMMENT	
		eligible Post-Consumer Scrap. Due diligence processes are in place for qualifying and follow up on scrap suppliers.	
4.3a Supplier records	Conformance	The Entity has an accounting system to identity, principals and place/s of operation of all direct suppliers of Recyclable Scrap Material.	
4.3b Cash payments	Conformance	The Entity does not make cash payments.	
5 CASTHOUSES: CRITERIA F	OR ASI ALUMIN	IIUM	
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity has a system in place ensuring that ASI Aluminium is produced only from casthouses that are either within the Entity's CoC Certification Scope or are certified against the ASI Performance Standard.	
5.1b ASI Performance Standard  – Casthouses	Conformance	The Entity has a system in place ensuring that ASI Aluminium is produced only from casthouses that are either within the Entity's CoC Certification Scope or are certified against the ASI Performance Standard.	
5.2 Casthouse Products	Conformance	The Entity's Material Accounting System ensures that unique identification numbers can be linked to the input quantity of CoC Material for that Material Accounting Period.	
6 POST-CASTHOUSE: CRITER	RIA FOR ASI AL	UMINIUM	
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's operating procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC Materials.	
6.1b ASI Performance Standard  – Post-Casthouse	Conformance	The Entity's operating procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC Materials.	
6.1c Sourcing ASI Aluminium	Conformance	The Entity's operating procedure and strategic cooperation with ASI certified suppliers will secure the supply and production of ASI CoC Materials.	
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL			
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has developed a Responsible Sourcing Policy covering all aspects of the ASI CoC and applicable ASI Performance Standard Criteria.	
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has adopted a Responsible Sourcing Policy covering aluminium, which conforms to the requirements of ASI CoC criteria and applicable ASI Performance Standard Criteria.	

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has developed policies, procedures and processes regarding responsible sourcing and human rights due diligence that conform to ASI CoC and applicable ASI Performance Standard Criteria.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has developed and maintains policies, procedures and processes that conform to ASI CoC and applicable ASI Performance Standard Criteria.
7.2 Risk assessment	Conformance	Procurement risk assessment completed and the ASI CoC Management System file established – including all relevant guidelines and procedures e.g. due diligence procedure, procurement risk assessment tools and supplier risk assessment tools.
7.3 Complaints mechanism	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the web: <a href="https://www.hydro.com/en/contact-us/">https://www.hydro.com/en/contact-us/</a>
8 MASS BALANCE SYSTEM:	COC MATERIAL	AND ASI ALUMINIUM
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass which conforms to ASI CoC requirement.
8.2a Post-Consumer Scrap	Conformance	The Entity has a Material Accounting System developed to govern and report on Input Quantity of Post-Consumer Scrap.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has a Material Accounting System developed to govern and report on Input Quantity of Pre-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has a Material Accounting System developed to govern and report on Input Quantity of Pre-Consumer Scrap delivering both CoC Material and Non-CoC Material.
8.3 Material Accounting Period	Conformance	The Entity will use a 12 month rolling period, as their accounting period. This is clearly stated in the ASI Management System Chain of Custody document that has been developed for the ASI Chain of Custody Standard.
8.4 Input Percentage	Conformance	The Entity has established a Material Accounting System in compliance with ASI CoC requirements.

CRITERION	RATING	COMMENT	
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity's Material Accounting System calculates the Input Percentage of Eligible Recyclable Scrap regarding re-melting/refining in line with the requirements in the ASI Chain of Custody Standard.	
8.6 Output Quantity determination	Conformance	The Entity has established a Material Accounting System in compliance with ASI CoC requirements.	
8.7 Output Quantity designation	Conformance	The Entity's Output Quantity is designated as 100% CoC Material as per Material Accounting System procedures and processes.	
8.8 Output Quantity – Pre- Consumer Scrap	Conformance	The Entity has established a Material Accounting System in compliance with ASI CoC requirements.	
8.9 Outputs not exceed inputs	Conformance	The Entity has established a Material Accounting System in compliance with ASI CoC requirements, and to have updated information on inventory balance on a monthly basis which conforms to the ASI Chain of Custody Standard requirement.	
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.	
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.	
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.	
8.11a Positive Balance (carry over)	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.	
8.11b Positive Balance (expiry)	Conformance	The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.	
9 ISSUING COC DOCUMENTS			
9.1 Shipments and transfers	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.	
9.2a Date of issue	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.	

CRITERION	RATING	COMMENT
9.2b Reference number	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2c Issuing Entity	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2d Receiving customer	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2e Responsible employee	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2f Conformance statement	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2g Type of CoC Material	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2h Mass of CoC Material	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.2i Mass of total material	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.
9.3a Sustainability Data (optional)	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable sustainability data in the CoC Document for CoC Material.
9.3b Sustainability Data (passing on)	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable sustainability data in the CoC Document for CoC Material.

CRITERION	RATING	COMMENT	
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has established both a procedure and an ASI CoC document template, ensuring that CoC documents are controlled, issued and stored as per ASI Chain of Custody requirements - including applicable sustainability data in the CoC Document for CoC Material.	
9.4 Supplementary Information (optional)	Conformance	The Entity has established both a procedure and a ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements.	
9.5 Response to verification requests	Conformance	The Entity has established both a procedure and a ASI CoC document template, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody requirements, including responding to requests for verification of information in CoC Documents issued by the Entity.	
9.6 Error management	Conformance	The Entity's procedures includes error management as per ASI Chain of Custody requirement. The Entity will inform relevant stakeholders on the situation regarding the error and agree on necessary corrective actions / improvements.	
10 RECEIVING COC DOCUME	NTS		
10.1 Verify required information included	Conformance	The Entity has established processes to ensure that CoC Documents are controlled, issued and stored as per ASI CoC requirements.	
10.2 Verify consistency with shipments	Conformance	The Entity has established processes to ensure that CoC Documents are controlled, issued and stored as per ASI CoC requirements.	
10.3 Verify supplier CoC Certification status	Conformance	The Entity has established processes to ensure that CoC Documents are controlled, issued and stored as per ASI CoC requirements.	
10.4 Error management	Conformance	The Entity has established processes to ensure that CoC Documents are controlled, issued and stored as per ASI CoC requirements.	
11 MARKET CREDITS SYSTEM: ASI CREDITS			
11.1a Material Accounting System – allocation	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	

CRITERION	RATING	COMMENT	
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to utilise the ASI market credits system.	
12 CLAIMS AND COMMUNICATIONS			
12.1a ASI Claims Guide	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.	

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.

# **Document Control and Version History**

Revision	Date	Notes
0	7 April 2020	Issued (Full Certification)
1	11 June 2020	Correction to conformance rating of criterion 2.1
2	14 July 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Łódź (Poland).
3	18 September 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Székesfehérvár (Hungary) and corrections to the supply chain activities and those specific to previous scope change audits.
4	30 September 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Nenzing (Austria).
5	17 December 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Tønder Extrusion (Denmark).
6	29 January 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Offenburg (Germany).
7	26 February 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites Rackwitz (extrusion) (Germany) and Uphusen (Germany).
8	8 July 2021	Surveillance Audit
9	31 August 2021	Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions Iberia sites Avintes (Portugal) and La Roca, La Selva and Navarra (Spain); and the Supply Chain Activity Aluminium Re-melting/Refining.