

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

BEL GROUP SABLÉ- SUR-SARTHE PLANT

CERTIFICATE
NUMBER

207

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

26 MAY 2022

DATE OF EXPIRY

25 MAY 2025

CERTIFIED SINCE

26 MAY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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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

All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Groupe BEL
ENTITY NAME	BEL Group Sablé-sur-Sarthe plant
CERTIFICATION SCOPE	All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	6 – 7 April 2022
AUDIT REPORT SUBMISSION	12 May 2022
AUDIT SCOPE	<p>All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	26 May 2022 – 25 May 2025
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DUE DATE	25 May 2025
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CERTIFICATION NUMBER	207
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	BEL Group has been a member of ASI in the Industrial Users membership category since 2017.
1.2 Management system	Conformance	The Entity has created a set of procedures for the application of the ASI Chain of Custody Standard to BEL Group and the Sablé-sur-Sarthe plant, interpreting in-depth each ASI criterion for the Group. These guidance documents are centrally available on BEL Group's quality and document management software.
1.3 Management system reviews	Conformance	The Entity has integrated ASI procedures into its document management system (KII) with an automatic alert system to ensure that the Management System is periodically reviewed and updated in light of implementation experience and to address potential areas of non-conformance.
1.4 Management representative	Conformance	An employee has been appointed as the ASI coordinator for the Group, as outlined in the Group procedures. The Entity's Quality Manager has been appointed as the ASI responsible person for the Sablé-sur-Sarthe plant, as outlined in their job description.
1.5 Training	Conformance	The Entity has created an internal ASI intranet location ('sharepoint') and conducted numerous training sessions and delivered communications as part of internal Monthly Project Steering Meetings since the beginning of its ASI engagement. This is registered in the ASI coordinator's log which also identifies the preferred method of communication, topics, recurrence and target.
1.6 Record keeping	Conformance	The Entity has confirmed that the retention period for ASI documents is to be at least 5 years. This is automatically managed through the KII document management system.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has documented in its 'Annual Declaration to the ASI Secretariat' procedure each point required by the ASI Chain of Custody Standard, including Input and Output Quantities of CoC Material over the calendar year.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has documented in its 'Annual Declaration to the ASI Secretariat' procedure each point required by the ASI Chain of Custody Standard, including Input Percentage/s calculated for the calendar year.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has documented in its 'Annual Declaration to the ASI Secretariat' procedure each point required by the ASI Chain of Custody Standard, including 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 documented in its 'Annual Declaration to the ASI Secretariat' procedure each point required by the ASI Chain of Custody Standard, including the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity does not use recycled aluminium and does not designate its scrap as ASI Material therefore this Criterion is not applicable.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity will not use ASI Credits therefore this Criterion is not applicable.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity does not use recycled aluminium and does not designate its scrap as ASI Material, therefore this Criterion is not applicable.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.2a Control of CoC Material	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.2b No further outsourcing	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.2c Risk assessment	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.3 Output Quantity	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.4 Verification and record-keeping	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
2.5 Error management	Not Applicable	The Entity does not have Outsourcing Contractors in its scope, therefore this Criterion is not applicable.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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 CoC Certification Scope - Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard - Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope - Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard - Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity sources aluminium for its packaging exclusively from ASI Certified suppliers. The stability of supply with those approved suppliers is central to the Entity's supply and sustainability strategies. There are systems in place to ensure this is respected, and the Entity has also created a

CRITERION	RATING	COMMENT
		procedure for verifying its suppliers' ASI Certification on a regular basis.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity is undertaking its certification process on both ASI Standards simultaneously. The initial certification audit for both Standards was successfully conducted in April 2022 and consequently BEL Group will be certified to the ASI Performance Standard in May 2022 at the same time as the ASI Chain of Custody Standard: https://aluminium-stewardship.org/about-asi/asi-members/groupe-bel/
6.1c Sourcing ASI Aluminium	Conformance	The Entity sources aluminium for its packaging exclusively from ASI Certified suppliers and there are systems in place to ensure this is respected.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Not Applicable	All of the Entity's aluminium suppliers are CoC Certified, therefore this Criterion is not applicable.
7.1b Responsible sourcing policy (responsible sourcing)	Not Applicable	All of the Entity's aluminium suppliers are CoC Certified, therefore this Criterion is not applicable.
7.1c Responsible sourcing policy (human rights due diligence)	Not Applicable	All of the Entity's aluminium suppliers are CoC Certified, therefore this Criterion is not applicable.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Not Applicable	All of the Entity's aluminium suppliers are CoC Certified, therefore this Criterion is not applicable.
7.2 Risk assessment	Not Applicable	All of the Entity's aluminium suppliers are CoC Certified, therefore this Criterion is not applicable.
7.3 Complaints mechanism	Conformance	Two comprehensive systems are in place at the Entity. These include a complaints system concerning the Entity's consumer products and an alert system for all other issues, including Supply Chain, Governance, Environment and Social/Human Rights. Those systems are appropriate to the nature, scale and impact of the business and that allows interested parties to voice concerns about non-compliance with its responsible sourcing policy in its aluminium supply chain.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System called Bilan Alu that clearly records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The system is based on Sablé's SAP program, which allows for rigorous and centralized collection of the information required for

CRITERION	RATING	COMMENT
		accounting. Detailed procedures have been written to formalise data collection and calculations.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	A Material Accounting Period of 12 months has been established for the Entity.
8.4 Input Percentage	Conformance	The Entity has made adequate plans in the Material Accounting Table to calculate and record the Input Percentage for a given Material Accounting Period using the exact formula outlined in the ASI CoC Standard. The units used in the numerator and the denominator are the same.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Entity's mass balance procedure outlines plans to use the percentage of inputs for the given Material Accounting Period to determine the Output Quantity of CoC Materials, by mass, as per the site's procedure.
8.7 Output Quantity designation	Conformance	The Output Quantity of CoC Material at Entity will be designated as 100% CoC Material, as outlined in the Entity's procedure.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity will not designate its Pre-Consumer Scrap as eligible ASI Material, but if this changes in the future the site will use the Input Percentage for the given Material Accounting Period to determine the Output Quantity of Eligible Scrap.
8.9 Outputs not exceed Inputs	Conformance	The formulas and data incorporated by the Entity into the Material Accounting System will ensure that the total output of CoC Materials will not proportionally exceed the Input Percentage as applied to the total inputs of CoC Materials during the defined period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The procedure to follow in the event of an internal shortage is clearly stated in the internal ASI procedure established by the Entity, including the fact that the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC material for the Material Accounting Period.

CRITERION	RATING	COMMENT
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The procedure to follow in the event of an internal shortage is clearly stated in the internal ASI procedure established by the Entity, including the fact that the Internal Overdraw will not exceed the amount of CoC Material affected by any force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The procedure to follow in the event of an internal shortage is clearly stated in the internal ASI procedure established by the Entity, including the fact that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's post-casthouse position means that it will by default always be in a surplus balance situation, this has been noted in the plant's internal ASI procedure.
8.11b Positive Balance (expiry)	Conformance	The Entity's post-casthouse position means that it will by default always be in a surplus balance situation, this has been noted in the plant's internal ASI procedure.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2a Date of issue	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2b Reference number	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2c Issuing Entity	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2d Receiving customer	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2e Responsible employee	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.

CRITERION	RATING	COMMENT
9.2f Conformance statement	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2g Type of CoC Material	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2h Mass of CoC Material	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.2i Mass of total material	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.3a Sustainability Data (optional)	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.3b Sustainability Data (passing on)	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.3c Post-Casthouse ASI Certification status	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.4 Supplementary Information (optional)	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.5 Response to verification requests	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
9.6 Error management	Not Applicable	The Entity will not ship or transfer CoC Material to other CoC Certified Entities as its products are for retail consumption, therefore this Criterion is not applicable.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has included in its goods reception manual clear steps and reminders to verify all required ASI

CRITERION	RATING	COMMENT
		specifications on the delivery note of the received goods.
10.2 Verify consistency with shipments	Conformance	The Entity has demonstrated its capacity to verify the consistency of received CoC Documents with the accompanying CoC Material before recording information in their Material Accounting System, through the amendments of company manuals to integrate ASI requirements and ASI designations directly written in its aluminium product names.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has designed a simple procedure and automated file for verifying its suppliers' certificates on the ASI website, the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material. Verification will be performed upon receipt of each order or quarterly, whichever is more frequent.
10.4 Error management	Conformance	If an error is discovered after CoC Material has been received, the Entity will document the error locally on a dedicated form and on the SAP system, communicate with the supplier and implement actions to avoid a recurrence, and follow the Group procedures on minor and major non-conformities depending on the gravity of the error.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.1b Link to Casthouse Products	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.1c No double counting	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.1d No Positive Balance for ASI Credits	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2a Date of issue	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2b Reference number	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2c Issuing Entity	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2d Receiving Entity	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.

CRITERION	RATING	COMMENT
11.2e Conformance statement	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2f ASI Credits statement	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.2g Quantity	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3b Material Accounting System – purchasing	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3c Expiry	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3d No re-trading	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3e No allocation to physical products	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3f Verify supplier CoC Certification status	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	The Entity will not use ASI credits, therefore this Criterion is not applicable.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Where the Entity makes claims and/or representations about CoC Material outside of CoC Documents, the Entity has systems in place to ensure that these are made in a manner and form consistent with the ASI Claims Guide. The Entity has developed a detailed and illustrated internal procedure to ensure this happens.
12.1b Verifiable evidence	Conformance	There is evidence to support future claims and/or representations made by the Entity as verified throughout this audit; this is also supported by the implementation of the Group's internal procedure, which includes staff training.
12.1c Employee training	Conformance	Appropriate training is provided for relevant employees to properly understand and communicate the claims and/or representations. The Entity has created an ASI training log that identifies individuals whose roles require ASI claims and communications training, and lists the presentations made.

Document Control and Version History

Revision	Date	Notes
0	26 May 2022	Initial Certification Audit - Full Certification