

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

GRANGES AMERICAS, INC.

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITOR
235	CHAIN OF CUSTODY (V1 2017)	FULL CERTIFICATION	DNV BUSINESS ASSURANCE SERVICES UK LTD.
DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE	
6 DECEMBER 2022	5 DECEMBER 2025	6 DECEMBER 2022	

AUTHORISED BY

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

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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

Design and manufacture of rolled strip and sheet of aluminum at Granges Americas, Inc production sites in Huntingdon (TN), Newport (AR) and Salisbury (NC) and the related corporate functions at the Headquarters in Franklin (TN) in the USA.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Granges Americas, Inc.
CERTIFICATION SCOPE	Design and manufacture of rolled strip and sheet of aluminum at Gränges Americas, Inc production sites in Huntingdon (TN), Newport (AR) and Salisbury (NC) and the related corporate functions at the Headquarters in Franklin (TN) in the USA.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• 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	<ul style="list-style-type: none">• 22 – 26 August 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 27 October 2022
AUDIT SCOPE	<p>The audit scope covers the production sites in Huntingdon (TN) (Aluminium re-melting, casting, and rolling operations), Salisbury (NC) (Aluminium re-melting, casting and rolling operations) and the related corporate functions at the Headquarters in Franklin (TN).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p>The Entity uses the ASI multi-site sampling approach, and the Newport (AR) site was not included in the audit scope. The audit of the Headquarters was undertaken remotely, consistent with a multi-site approach.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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.

CERTIFICATION
PERIOD

6 December 2022 – 5 December 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

5 June 2024

CERTIFICATION
NUMBER

235

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member in the Production and Transformation class since January 2019. The Entity is committed to complying with all obligations to ASI membership and the ASI Grievance Mechanism. https://aluminium-stewardship.org/about-asi/asi-members/granges
1.2 Management system	Conformance	The Entity has implemented a Management System and established a CoC management manual for compliance with all applicable requirements of the CoC.
1.3 Management system reviews	Conformance	The Entity has defined within its procedures the requirement for annual review of the Management System by the Senior Management to identify improvements in the CoC Management System.
1.4 Management representative	Conformance	The Entity has nominated the Corporate Environmental Manager as the representative of the Board with overall responsibility and authority to ensure compliance with the ASI Chain of Custody Standard requirements.
1.5 Training	Minor Non-Conformance	The Entity has established a training plan for relevant personnel. However, training material was not finalized at the time of the Audit.
1.6 Record keeping	Minor Non-Conformance	The Entity has established that the records for the Entity's CoC System are to be stored for a minimum period of five years. However, there is no evidence that the Entity has defined which records will be stored for at least five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat

CRITERION	RATING	COMMENT
		through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity has established a procedure that defines the method for reporting information to the ASI Secretariat through a base excel spreadsheet, which will be used to transfer the data to the ASI platform (elementAL).
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.5 Error management	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope - Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard - Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	Conformance	The Entity's Casthouse activities use Primary Aluminium and Recycled Aluminium. The Entity warrants that ASI Aluminium will be produced from foundries that are within the Entity's CoC Certification Scope, and/or in which the Entity has a legal interest and within the CoC Certification Scope of another CoC Certified Entity.
5.1b ASI Performance Standard - Casthouses	Conformance	The Entity has defined procedures and systems to ensure that Casthouse Products are only produced in foundries that are certified in accordance with the ASI Performance Standard. The Entity's Primary Aluminium is sourced from Certified Entities and Recycled Aluminium is from internal scrap. Recycled Aluminium is also sourced from external sources as Non-CoC Material.
5.2 Casthouse Products	Conformance	The Entity has defined procedures and systems for traceability purposes that the Material Accounting System has unique identifications fixed on ASI Aluminium to ensure linkage to the Input Quantity of CoC Material for the Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity produces ASI Aluminium only from material sourced from a CoC Certified Entity. The Entity has

CRITERION	RATING	COMMENT
		established the method and control systems to ensure that Primary Aluminium comes from ASI Certified Entities.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity has defined procedures and systems to ensure that is producing ASI Aluminium only from an Entity/Facility already certified to the ASI Performance Standard and ASI Chain of Custody Standard by default, if applicable. Material from entities not certified is considered as Non-CoC Material, not generating a positive balance for the Mass Balance.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has established systems to ensure that it is itself producing ASI Aluminium only from an Entity/Facility that sources ASI Aluminium directly from another ASI Chain of Custody Certified Entity, or via a metals Trader or warehouse where the ASI Chain of Custody Certified Entity can supply or verify the associated CoC Document containing the required Information.

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

7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has established and communicated an Anti-Corruption Policy for its Primary and Recycled Aluminium materials supply chain: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gd12_granges_-anti-corruption-policy.pdf https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp16_global-responsible-sourcing-policy_final-20210127.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established and communicated a Responsible Sourcing Policy for its Primary and Recycled Aluminium materials supply chain: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gd12_granges_-anti-corruption-policy.pdf https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp16_global-responsible-sourcing-policy_final-20210127.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established and communicated a Responsible Sourcing Policy and a Supplier Code of Conduct, which included the Human Rights assessment, for its Primary and Recycled Aluminium materials supply chain: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp16_global-responsible-sourcing-policy_final-20210127.pdf

CRITERION	RATING	COMMENT
		https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp17_granges-supplier-coc_20220525.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has established and communicated its Responsible Sourcing Policy and Supplier Code of Conduct, which includes the assessment of Human Rights and the prevention of the purchase of materials in areas that are conflict affected and high risk areas (CAHRAs), for its supply chain of Primary and Recycled Aluminium Materials.</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp16_global-responsible-sourcing-policy_final-20210127.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp17_granges-supplier-coc_20220525.pdf</p>
7.2 Risk assessment	Conformance	The Entity uses the EcoVadis Platform as a tool for assessing risk and monitoring the performance of its suppliers within the supply chain. Suppliers must agree and sign the Supplier Code of Conduct and, if applicable, the supplier must submit ASI Certification information.
7.3 Complaints mechanism	Conformance	<p>The Entity has established a complaints mechanism that is made available to the supplier through the Anti-Corruption Policy, accessible on the Granges website:</p> <p>https://granges.trumpet-whistleblowing.eu</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gd12_granges_-anti-corruption-policy.pdf</p>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has defined the Material Accounting System and is developing an automated tool to manage and track ASI Certified Aluminium internally through to the customers. This includes recording the inbound and outbound quantity of ASI CoC Material and Non-CoC Material.
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.

CRITERION	RATING	COMMENT
8.3 Material Accounting Period	Conformance	The Entity defined the Material Accounting System considering the period of 12 months within a calendar year.
8.4 Input Percentage	Conformance	The Entity has defined the Material Accounting System and is developing an automated tool to manage and track ASI Certified Aluminium including the Input Percentage for a given Material Accounting Period.
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 has established the Material Accounting System and is developing an automated tool to manage and track ASI Certified Aluminium including the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Material, by mass.
8.7 Output Quantity designation	Conformance	The Entity has established the Material Accounting System for the CoC System and is developing an automated tool to manage and track ASI Certified Aluminium. This includes where the Output Quantity of CoC Material, which may be a subset of the total production, is designated as 100% CoC Material.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity has established the Material Accounting System for the CoC System and is developing an automated tool to manage and track ASI Certified Aluminium. This includes Pre-Consumer Scrap generated from its processes. The Entity uses the Input Percentage for the 12-month Material Accounting Period to determine the Output Quantity of Eligible Scrap.
8.9 Outputs not exceed Inputs	Conformance	The Entity has defined the Material Accounting System for the CoC System ensures that the total Output of CoC Material and Eligible Scrap does not exceed the Input Percentage as applied to the total input of CoC Material and Eligible Scrap over the 12-month Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has defined the Material Accounting System for the CoC System that ensures that the Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting within twelve months.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has defined the Material Accounting System for the CoC System that ensures that the Internal Overdraw shall not exceed the amount of CoC Material affected for the Material Accounting within twelve months.

CRITERION	RATING	COMMENT
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has defined in the accounting procedure that in situations of delay of CoC Material due to a situation of Force Majeure, the Entity's Material Accounting System is prepared to transfer an Internal Withdrawal to the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity has defined in the Material Accounting System that the transfer of a Positive Balance can be carried forward to the subsequent accounting period.
8.11b Positive Balance (expiry)	Conformance	The Entity has defined in the accounting procedure that the transfer of an outgoing Positive Balance of CoC Material at the end of a Material Accounting Period may be carried over to the subsequent Material Accounting Period and will expire at the end of that period if not withdrawn.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2a Date of issue	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2b Reference number	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2c Issuing Entity	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2d Receiving customer	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2e Responsible employee	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2f Conformance statement	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.

CRITERION	RATING	COMMENT
9.2g Type of CoC Material	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2h Mass of CoC Material	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.2i Mass of total material	Conformance	The Entity has defined a CoC Document template with all the required information that has been set up to accompany shipments or transfers of CoC Material to customers.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable as the Entity does not wish to include Supplementary Information in CoC Documents.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable as the Entity does not wish to include Supplementary Information in CoC Documents.
9.3c Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Sustainability Data in CoC Documents.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable as the Entity does not wish to include Sustainability Data in CoC Documents.
9.5 Response to verification requests	Conformance	The Entity has established procedures and systems to enable it to respond to reasonable requests for verification of information in CoC Documents issued by the Entity.
9.6 Error management	Conformance	The Entity has defined that if an error occurs within a process for sending CoC Material, it will be incorporated and managed using the same tools available in the Entity's Management System for handling non-conformities.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has established procedures to verify that all required information in received CoC Documents is included.
10.2 Verify consistency with shipments	Conformance	The Entity has established procedures to verify the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined that for each purchase order issuance, the Entity will verify the Certification Status of the supplier on the ASI website:

CRITERION	RATING	COMMENT
		https://aluminium-stewardship.org/about-asi/asi-member-listing
10.4 Error management	Conformance	The Entity has defined that if an error occurs on receipt of CoC Material or Eligible Scrap, it must be incorporated and managed using the same tools available in the Entity's Management System for handling non-conformities.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has defined the methodology to ensure that all future claims on CoC Material made outside the CoC Documents are made in a manner consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has established procedures to ensure that it keeps verifiable evidence to support claims and/or representations made.
12.1c Employee training	Conformance	The Entity has defined and provided appropriate training to relevant employees to understand and communicate ASI claims and/or representations.

Document Control and Version History

Revision	Date	Notes
0	6 December 2022	Initial Certification Audit – Full Certification