

ASI Chain of Custody (CoC) Standard

VERSION 2
May 2022



Aluminium Stewardship Initiative (ASI)

ASI is a not-for-profit standards setting and certification organisation for the aluminium value chain.

Our **vision** is to maximise the contribution of aluminium to a sustainable society.

Our **mission** is to recognise and collaboratively foster responsible production, sourcing and stewardship of aluminium.

Our **values** include:

- Being inclusive in our work and decision making processes by promoting and enabling the participation of representatives in all relevant stakeholder groups.
- Encouraging uptake throughout the bauxite, alumina and aluminium value chain, from mine to downstream users.
- Advancing material stewardship as a shared responsibility in the lifecycle of aluminium from extraction, production, use and recycling.

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Disclaimer

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Organisations that make ASI-related claims are each responsible for their own Compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that Compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in Compliance with any Applicable Law or will avoid any Breach from occurring.

Version 2.0.1 (updates specific passages to meet ISEAL requirements)

The official language of ASI is English. ASI aims to make translations available in a range of languages and these will be posted on the ASI website. In the case of inconsistency between versions, reference shall default to the official language version.

ASI Chain of Custody Standard

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Introduction

A. Background

The Aluminium Stewardship Initiative (ASI) is a non-profit, multi-stakeholder organisation which exists to administer an independent third-party Certification program for the Aluminium value chain. The ASI Certification program provides assurance against two voluntary Standards: the **ASI Performance Standard** and the **ASI Chain of Custody Standard**.

The **ASI Performance Standard** defines environmental, social and governance Principles and Criteria that address sustainability issues in the Aluminium value chain. ASI Members in the Production and Transformation and Industrial Users membership classes are required to have at least one Facility certified against the **ASI Performance Standard** within two years of joining ASI. For more information, please visit aluminium-stewardship.org.

The **ASI Chain of Custody (CoC) Standard** (this Standard) complements the **ASI Performance Standard**, and is voluntary for ASI Members, though encouraged. The **ASI CoC Standard** sets out requirements for the maintenance of a Chain of Custody for CoC Material, including ASI Aluminium through the value chain.

The **ASI CoC Standard** specifies two starting points for ASI Aluminium: Primary and Recycled, connected into the Aluminium supply chain through a Mass Balance System, which requires an unbroken chain of CoC Certified Entities to supply it.

B. Purpose

ASI's long-term objective is to increase the supply of, and demand for, ASI Aluminium through the global value chain, providing independent assurance of responsible production, sourcing and stewardship of Aluminium, through implementation of the **ASI CoC Standard**.

The **ASI CoC Standard** aims to support responsible supply chains by:

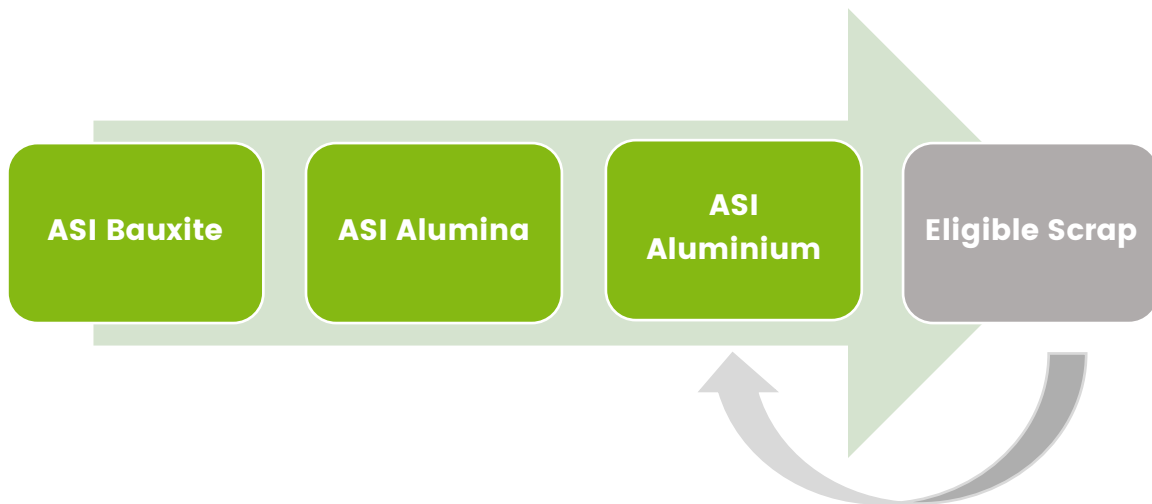
- Providing a common Standard for ASI Members who wish to implement Mass Balance Chain of Custody systems in the Aluminium value chain
- Establishing requirements that can be independently audited against Objective Evidence for the granting of ASI CoC Certification
- Serving as a broader reference for the establishment and improvement of responsible production, sourcing and stewardship initiatives in metals supply chains.

The implementation of **ASI CoC Standard** enables a link between verified practices at successive steps of the supply chain under the **ASI Performance Standard**, to the Products produced by ASI Certified Entities.

C. Scope

The **ASI CoC Standard** defines requirements for Entities and Facilities implementing Chain of Custody Management Systems, including systems for sourcing, accounting and transfer of CoC Material and Eligible Scrap.

CoC Material is a collective term for ASI Bauxite, ASI Alumina and ASI Aluminium produced by, and shipped/transferred to, ASI Certified Entities in accordance with the **ASI CoC Standard**.



At various points in the **ASI CoC Standard**, the term 'CoC Material' may be used to mean any of these, or one of the specific terms above may be used instead. Eligible Scrap is another kind of Input/Output but is not CoC Material until it is designated ASI Aluminium by the Aluminium Re-Melter/Refiner, so is referred to separately.

Throughout this **CoC Standard** the use of the terms Input and Output refer specifically to the flow of CoC Material into and out of an Entity's Certification Scope. As CoC Material moves between supply chain activities within an Entity's Certification Scope, the term Intra-Entity Flow is used. The flow of all material (encompassing both CoC and Non-CoC) into and out of an Entity and/or its supply chain activities is referred to generally as Inflow and Outflow.

Other metals contained in alloys, platings, coatings, laminates or product components, and other materials such as plastics, glass, paints and agricultural products, which may be found in combination with CoC Material or Eligible Scrap at one or more stages of the value chain, are outside the scope of the **ASI CoC Standard** and are treated as neutral materials.

D. Status and Effective Date

This is Version 2 of the **ASI Chain of Custody Standard**, which was approved by the ASI Standards Committee and adopted as an ASI Standard by the ASI Board on 27th April 2022.

Members are required to demonstrate Conformance to Version 2 of the **ASI Chain of Custody Standard** in all New and Re-Certification Audits conducted from 1st June 2023. Audits conducted between 1st June 2022 and 31st May 2023 may be against either version of the Standard.

Surveillance Audits will be based on the version used for the initial Certification.

Existing Certifications against Version 1 may continue for their full Certification cycle, but from 1st June 2023 the Re-Certification Audit must use Version 2.

E. Standards Development

Development of this Standard has been underpinned by formal and transparent multi-stakeholder processes. ASI is sincerely grateful for the time, expertise and valuable input of the many individuals and organisations who contributed to this Standard.

Version 1 of this Standard was overseen initially by the ASI Standards Setting Group (SSG) under the co-ordination of IUCN, and then by the ASI Standards Committee, and supported by four public comment periods between 2014 and 2017 and a pilot test in 2017.

The revision process culminating in Version 2 of this Standard has been conducted in a formal, collaborative, multi-stakeholder process governed under the ASI Standards Setting Procedure v3.2. Revisions were based on feedback and experience implementing the Standard since it was launched in December 2017.

ASI is a Code-Compliant ISEAL member and conducts standards development in conformance with the ISEAL Standard-Setting Code of Good Practice for Setting Social and Environmental Standards v 6.0 (2014). More information on ASI's Standards Development processes can be found at:

<http://aluminium-stewardship.org/standard-setting-process/activities-and-plans/>.

F. Application

ASI Members all share a commitment to the responsible production, sourcing and stewardship of Aluminium, but have varied interests, considerations and priorities about the Chain of Custody of the Aluminium they buy and sell. The **ASI Chain of Custody (CoC) Standard** is therefore voluntary for ASI Members, though it is recommended as a way to add value to Certification against the **ASI Performance Standard**.

ASI Members in the Production and Transformation and Industrial Users membership classes are required to achieve **ASI Performance Standard** Certification against applicable requirements, for at least part of their operations within two years of joining ASI.

Note that unless otherwise specified, the Criteria are applicable to all Facilities.

However, CoC Certification is mandatory for Businesses that make any claims relating to production or sourcing of CoC Material, ASI Aluminium, as defined under the **ASI CoC Standard**. Without CoC Certification, such claims cannot be made.

The Standard is open to all interested users. However, ASI Certification can only be granted to ASI Members or Entities under the Control of ASI Members, on the basis of verification of Conformance by ASI Accredited Auditors.

G. Certification

The **ASI CoC Standard** is designed for use by ASI Accredited Auditors to verify an Entity's Conformance for the purposes of granting ASI CoC Certification. Note that Certification against the **ASI Performance Standard** is also a parallel requirement, and this is specified in the relevant Criteria of the **ASI CoC Standard**.

The Entity's CoC Certification Scope is defined by the Entity seeking Certification and includes all Facilities (and where applicable, Outsourcing Contractors) that the Entity intends to use for the processing, accounting, shipping and/or receiving of CoC Material.

The steps for ASI CoC Certification are laid out in the ASI Assurance Manual and are summarised as follows:

- The Entity prepares for and requests a Certification Audit from an ASI Accredited Auditor. This may be separate to, or alongside, an Audit for the **ASI Performance Standard**.
- During the Certification Audit, the Auditor verifies the Entity has systems in place that conform to the **ASI CoC Standard** to source and/or supply CoC Material. Minor Non-Conformances will be noted and the Entity will be directed to address them.
- Once the Entity achieves CoC Certification, it is authorised to begin issuing CoC Documents for CoC Material.
- Depending on the Entity's Overall Maturity Rating, there may be a Surveillance Audit of the Certified Entity within twelve to twenty-four months to verify that systems, including the issuing and receiving of CoC Documents etc, are working effectively.
- It is expected that the implementation of any corrective action(s) required due to Minor Non-Conformances identified during the Certification Audit should have commenced as a minimum prior to the Surveillance Audit.
- After the Certification Period of three years, a Re-Certification Audit would be required to renew CoC Certification, followed again, depending on the Certified Entity's Overall Maturity Rating, by a Surveillance Audit within twelve to twenty-four months.

H. Supporting Documents

The following documents provide supporting information to assist with implementing the **ASI CoC Standard**:

- **ASI CoC Standard – Standards Guidance**
- **ASI Assurance Manual**
- **ASI Claims Guide**
- **ASI Glossary.**

The **ASI Performance Standard** contains requirements that are also applicable to Entities applying the **ASI CoC Standard**. The **ASI Performance Standard** covers governance, environmental and social issues in the Aluminium value chain, and should be read in conjunction with the **ASI CoC Standard**.

I. Review

ASI undertakes to review formally this version of the Standard by 2027, five years after first publication, or earlier as required. Proposals for revisions or clarifications can be submitted by interested parties at any time, and ASI will document these for consideration in the next review process. ASI will continue to work with stakeholders and Members to ensure that these Standards are relevant and achievable.

J. Measuring Impacts

The ASI Monitoring and Evaluation (M&E) program is designed to assess the impact of ASI Certification. Impacts are long-term changes in the sustainability areas that the Standard aims to address and their understand and demonstration are critical for standards programs' success. ASI's M&E program measures short and medium-term changes to understand how these contribute to long-term impacts, and also identifies how ASI's certification program can be improved over time.

In implementing this program, ASI complies with the ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards v2.0 (2014). ASI is bound by its **Anti-Trust Compliance Policy** and **Confidentiality Policy** in dealing with commercially sensitive information. These policies are available on the [ASI website](#).

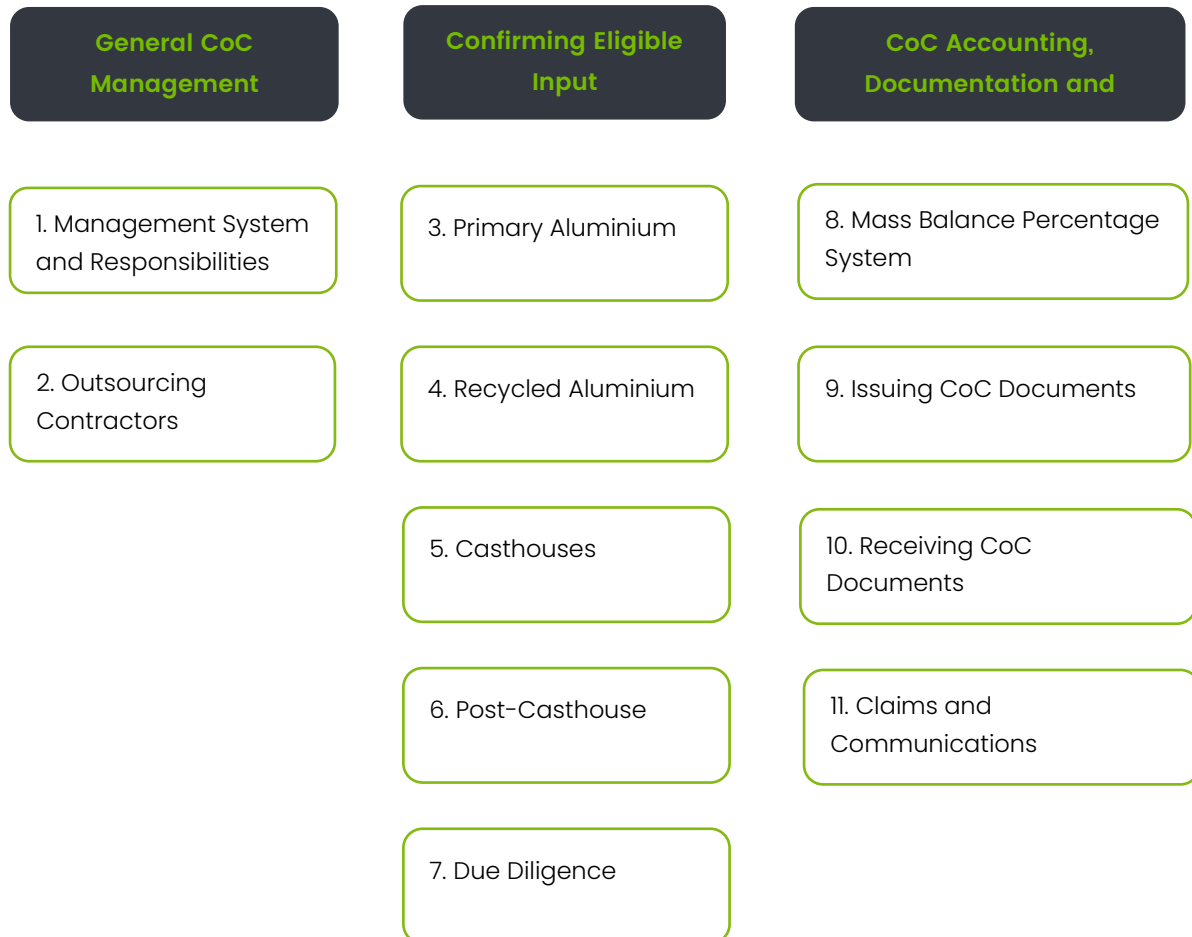
K. How to Read the Standard

Please note the following:

- The **ASI CoC Standard** contains 11 Sections organised into 3 parts
- *Italicised text provides background and intent for each Section but is not normative*
- Auditable Criteria are numbered in each Section (for example '1.1')

- All capitalised common terms and acronyms (for example 'Entity') are defined in the **ASI Glossary**.

The 3 parts and 11 Sections are grouped as follows:



ASI Chain of Custody (CoC) Standard

A. General CoC Management (Sections 1-2)

1. Management System and Responsibilities

Section 1 outlines the general elements of Management Systems an Entity needs to implement effectively the **ASI CoC Standard**. An Entity may consist of a single Facility or multiple Facilities but must be under the Control of an ASI Member to link to the ASI's membership obligations and the **ASI Complaints Mechanism**. The Criteria in this Section can usually be integrated into existing Management Systems relevant to managing sales, procurement and inventory.

- 1.1 **ASI Membership.** The Entity seeking CoC Certification shall be an ASI Member in good standing in the Production and Transformation or Industrial Users membership classes, or under the Control of such an ASI Member, thereby committing to comply with ASI's membership obligations and the **ASI Complaints Mechanism**.

Application:

This Criterion applies to all Facilities.

- 1.2 **CoC Management System.** The Entity shall have a Management System that addresses all applicable requirements of the **ASI CoC Standard**, in all Facilities within the Entity's CoC Certification Scope that take Custody of CoC Material.

Application:

This Criterion applies to all Facilities.

- 1.3 **CoC Management System Monitoring.** The Entity shall ensure that the Management System for Criterion 1.2 is periodically reviewed and updated in light of implementation experience and to address potential areas of Non-Conformance.

Application:

This Criterion applies to all Facilities.

- 1.4 **Management Representative.** The Entity shall have at least one Management Representative with overall responsibility and authority for the Entity's Conformance with all applicable requirements of the **ASI CoC Standard**.

Application:

This Criterion applies to all Facilities.

- 1.5 **Communications and Training.** The Entity shall establish and implement communications and training measures that make relevant personnel aware of and competent in their responsibilities under the **ASI CoC Standard**.

Application:

This Criterion applies to all Facilities.

- 1.6 **Records Management.** The Entity shall maintain up to date records covering all applicable requirements of the **ASI CoC Standard** and shall retain them for a minimum of five years.

Application:

This Criterion applies to all Facilities.

- 1.7 **Reporting to ASI Secretariat.** The Entity shall report the following information (as applicable) to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year:

- a. Input and Output Quantities of CoC Material/s to/from the Certified Entity over the calendar year.
- b. Input and Output Quantities of Eligible Scrap to/from the Certified Entity over the calendar year.
- c. Inflow and Outflow Quantities of Non-CoC Material/s to/from the Certified Entity over the calendar year.
- d. Positive Balance carried over to the subsequent Material Accounting Period, if any.
- e. Positive Balance used, if any.
- f. Internal Overdraw drawn down from the subsequent Material Accounting Period, if any.

For Entities with more than one type of CoC Material Output:

- g. Quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity Flows) over the calendar year.

Application:

This Criterion applies to all Facilities.

2. Outsourcing Contractors

Outsourcing Contractors are encouraged to become CoC Certified in their own right. However, it is recognised there are often challenges in uptake of CoC Certification in long or flexible supply chains, or by smaller Businesses. Section 2 provides Entities seeking CoC Certification with the ability to outsource processing, treatment or manufacturing of CoC Material that they own or control to non-CoC Certified Outsourcing Contractors, by including them in their own CoC Certification Scope.

- 2.1 **Certification Scope.** Any Outsourcing Contractor without CoC Certification that takes Custody of an Entity's CoC Material for the purposes of further processing, treatment or manufacturing, shall be identified in the Entity's CoC Certification Scope.

Application:

This Criterion applies where the Entity uses Outsourcing Contractors that takes custody of CoC Material that they own or control.

- 2.2 **Control of CoC Material.** Entities that wish to include Outsourcing Contractors within their CoC Certification Scope shall ensure that each of the following conditions is met:
- a. The Entity has legal ownership or control of all CoC Material used by Outsourcing Contractors.
 - b. Any Outsourcing Contractor shall not outsource any processing, treatment or manufacturing of CoC Material to any other contractor.
 - c. The Entity has assessed the risk of potential Non-Conformance with the **ASI CoC Standard** resulting from the engagement of each Outsourcing Contractor included within the CoC Certification Scope and determined that the risk is acceptable.

Application:

This Criterion applies where the Entity uses Outsourcing Contractors that takes custody of CoC Material that they own or control.

- 2.3 **Information on Quantity of CoC Material Output and Returned.** The Entity shall ensure that the Outsourcing Contractor provides information on Output Quantity of CoC Material and the Quantity of CoC Material returned to the Entity at the conclusion of the Entity's Material Accounting Period (or more frequently as required by the Entity).

Application:

This Criterion applies where the Entity uses Outsourcing Contractors that takes custody of CoC Material that they own or control.

- 2.4 **Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor.** The Entity shall have systems in place to verify that the Quantity of CoC Material Output or returned by Outsourcing Contractor is consistent with the Quantity of CoC Material provided to the Outsourcing Contractor and shall record Quantities in the Material Accounting System.

Application:

This Criterion applies where the Entity uses Outsourcing Contractors that takes custody of CoC Material that they own or control.

- 2.5 **Error (Outsourcing Contractor).** If an 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.

Application:

This Criterion applies where the Entity uses Outsourcing Contractors that takes custody of CoC Material that they own or control.

B. Confirming Eligible Inputs of CoC and Non-CoC Material (Sections 3-7)

3. Primary Aluminium: Criteria for ASI Bauxite, ASI Alumina and ASI Aluminium

A Chain of Custody must have a starting point, and in the case of Aluminium this is either Primary or Recycled. Section 3 is focused on Primary Aluminium and requires that ASI Bauxite comes from Bauxite Mines and is further processed through Alumina Refineries and Aluminium Smelters, which are also certified against the **ASI Performance Standard**.

- 3.1 **ASI Bauxite.** An Entity engaged in Bauxite Mining shall have systems in place to ensure that ASI Bauxite is produced only from Bauxite Mines that are:
- a. Within the Entity's CoC Certification Scope and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. Certified against the **ASI Performance Standard**.
 - c. Sourcing ASI Bauxite either:
 - i. directly from another ASI CoC Certified Entity, or
 - ii. via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Bauxite can be identified and can provide a verified CoC Document.

Application:

This Criterion applies to Bauxite Mines.

- 3.2 **ASI Alumina.** An Entity engaged in Alumina Refining shall have systems in place to ensure that ASI Alumina is produced only from Alumina Refiners that are:
- a. Within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. Certified against the **ASI Performance Standard**.
 - c. Sourcing ASI Bauxite either:
 - i. directly from another ASI CoC Certified Entity, or
 - ii. via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Bauxite can be identified and can provide a verified CoC Document.

Application:

This Criterion applies to Alumina Refineries.

- 3.3 **ASI Aluminium.** An Entity engaged in Aluminium Smelting shall have systems in place to ensure that ASI Aluminium is produced only from Aluminium Smelters that are:
- a. Within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. Certified against the **ASI Performance Standard**.
 - c. Sourcing ASI Alumina either:
 - i. directly from another ASI CoC Certified Entity, or

- ii. via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Alumina can be identified and can provide a verified CoC Document.

Application:

This Criterion applies to Aluminium Smelters.

4. Recycled Aluminium: Criteria for Eligible Scrap

*Recycled Aluminium is the second potential starting point for Chain of Custody for ASI Aluminium. The **ASI CoC Standard** anticipates that the first Entity in the Chain of Custody of recycled CoC Material will be engaged in Aluminium Re-melting and/or Refining (Aluminium Refining includes, but is not limited to, recovery and refining of Aluminium from Dross and other aluminium containing wastes). Section 4 requires that 'know your customer' principles apply to suppliers of Recyclable Scrap Material (and the Due Diligence requirements of Section 7 also apply). This Section sets the **ASI CoC Standard's** requirements for Entities producing Recycled Aluminium from Recyclable Scrap Material.*

- 4.1 **Recycled Aluminium.** An Entity engaged in Aluminium Re-Melting/Refining to produce Recycled Aluminium shall have systems in place to ensure that ASI Aluminium is produced only from Facilities that are:
- a. Within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. Certified against the **ASI Performance Standard**.

Application:

This Criterion applies to Aluminium Re-Melters/Refiners.

- 4.2 **Eligible Scrap.** An Entity engaged in Aluminium Re-Melting/Refining shall account for Eligible Scrap in their Material Accounting System as only:
- a. Pre-Consumer Scrap that is:
 - i. subject to supplier Due Diligence as per Section 7 and assessed as being designated ASI Aluminium Output from the Entity's Certification Scope, traced through an uncertified Facility and back in to the Entity's Certification Scope as Scrap in a Closed Loop, or
 - ii. supplied directly from another ASI CoC Certified Entity with the accompanying CoC Document, or
 - iii. supplied via a Trader, where the ASI CoC Certified Entity that is the source of the Eligible Scrap can be identified and can provide a verified CoC Document.
 - b. Scrap that is assessed by the Entity to be Post-Consumer in origin and subject to supplier Due Diligence as per Section 7.
 - c. Aluminium recovered from Dross and other aluminium containing wastes that is subject to supplier Due Diligence as per Section 7.

Application:

This Criterion applies to Aluminium Re-Melters/Refiners

- 4.3 **Records Management for Direct Suppliers of Recyclable Scrap Material.** An Entity engaged in Aluminium Re-Melting/Refining shall have systems in place to record:
- a. The identity, principles and place/s of operation of all direct suppliers of Recyclable Scrap Material.
 - b. All financial transactions with direct suppliers of Recyclable Scrap Material, ensuring that cash payments are within the lower of the relevant defined financial threshold under Applicable Law or US\$10,000 (or equivalent), where the transaction is carried out in a single operation or in several operations that appear to be linked.

Application:

This Criterion applies to Aluminium Re-Melters/Refiners.

5. Casthouses: Criteria for ASI Aluminium

For both Primary and Recycled Aluminium, Casthouses are the point at which Aluminium is formed into solid metal forms for subsequent Material Conversion and/or manufacturing. Section 5 deals with the Certification requirements for Casthouses and both the Liquid Metal and Cold Metal Inflows and Outflows that are part of the Casting process.

- 5.1 **ASI Aluminium.** An Entity engaged in producing Casthouse Products shall have systems in place to ensure that ASI Aluminium is produced only from Casthouses that are:
- a. Within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. Certified against the **ASI Performance Standard**.
 - c. Sourcing ASI Aluminium either:
 - i. directly from another ASI CoC Certified Entity, or
 - ii. via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Aluminium can be identified and can provide a verified CoC Document.

Application:

This Criterion applies to Casthouses.

- 5.2 **Unique Identification.** For traceability purposes, the Material Accounting System of an Entity engaged in producing Casthouse Products shall have systems in place to ensure that unique identification numbers, either physically stamped and/or printed on or with ASI Aluminium by the Entity, correspond to the Input Quantities of CoC Material for that Entity's Material Accounting Period.

Application:

This Criterion applies to Casthouses.

6. Post-Casthouse: Criteria for ASI Aluminium

*Casthouse Products are destined for a wide range of Semi-Fabrication pathways and subsequent Material Conversion, downstream manufacturing and use. Supply chains from the Casthouse onwards ('Post-Casthouse') are often highly diverse and/or fragmented. Section 6 applies to Post-Casthouse Entities that source physical ASI Aluminium direct from Casthouses or via another downstream Entity and use the **ASI CoC Standard** to make claims about their own production of ASI Aluminium.*

- 6.1 **Post-Casthouse ASI Aluminium.** A Post-Casthouse Entity that sources ASI Aluminium shall have systems in place to ensure that it is itself producing ASI Aluminium only from Facilities:
- a. Within the Entity's CoC Certification Scope, and/or in which the Entity holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity.
 - b. That can demonstrate that they will certify against the **ASI Performance Standard** within two years of joining ASI.
 - c. Sourcing ASI Aluminium either:
 - i. directly from another ASI CoC Certified Entity, or
 - ii. via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Aluminium can be identified and can provide a verified CoC Document.

Application:

This Criterion applies to Post-Casthouse Facilities.

7. Due Diligence for Non-CoC Material, CoC Material Acquired through a Trader and Recyclable Scrap Material

Section 7 requires Entities to conduct Due Diligence of suppliers of Non-CoC Material, CoC Material acquired through a Trader and Recyclable Scrap Material for potential environmental, social or governance risks and take reasonable action to prevent or mitigate risks. This aligns with ASI's mission to promote responsible sourcing. It does not preclude Entities sourcing from non-ASI suppliers.

- 7.1 **Responsible Sourcing Policy.** The Entity shall adopt and communicate to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material supplied through a Trader a responsible sourcing Policy covering Aluminium, which as a minimum takes account of the following Criteria in the **ASI Performance Standard**:
- a. 1.2 (Anti-corruption).
 - b. 2.4 (Responsible Sourcing).
 - c. 9.1 (Human Rights Due Diligence).
 - d. 9.8 (Conflict-Affected and High-Risk Areas).

Application:

This Criterion applies to all Facilities.

7.2 **Risk Assessment and Mitigation.** The Entity shall assess the risks of non-compliance with its responsible sourcing Policy by, at a minimum, its direct (tier 1) suppliers (including Traders) of Non-CoC Material, Recyclable Scrap Material and CoC Material and Eligible Scrap supplied by a Trader, document the findings, and undertake measurable risk mitigation where risks of adverse impacts are identified.

Application:

This Criterion applies to all Facilities.

7.3 **Complaints Resolution Mechanism.** The Entity shall establish a Complaints Resolution Mechanism as per Criterion 3.4 in the **ASI Performance Standard**, that is 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.

Application:

This Criterion applies to all Facilities.

C. CoC Accounting, Documentation and Claims (Sections 8-12)

8. Mass Balance System: CoC Material and ASI Aluminium

*The Mass Balance System requires each successive Entity handling CoC Material to be CoC Certified to create an unbroken Chain of Custody. It allows for CoC Materials to be mixed with Non-CoC Material over a defined period, at any stage in the value chain. The Entity's Material Accounting System is used to verify that the Output of CoC Materials from an Entity does not proportionally exceed the Input to its Certification Scope. Note that the **ASI CoC Standard** stipulates that the Output of CoC Material cannot be allocated as 'partially CoC' – so if 20% of Outflow is 'CoC', that 20% is 100% CoC (and not all Outflow is "20% CoC").*

8.1 **Material Accounting System.** The Entity's Management System shall include a Material Accounting System that safeguards the integrity of CoC Material and Eligible Scrap Mass Balance within the Certification Scope.

Application:

This Criterion applies to all Facilities.

8.2 **Material Accounting Period.** The Entity's Material Accounting System shall specify a Material Accounting Period, which shall not be longer than 12 months.

Application:

This Criterion applies to all Facilities.

8.3 **Input and Inflow Quantities.** The Entity shall, over a given Material Accounting Period, record the Quantities of each CoC Material and Eligible Scrap Input and the Quantities of Non-CoC Material

and Recyclable Scrap Material Inflow to the Certification Scope. The Inflow Quantity of Eligible Scrap and Recyclable Scrap Material shall be based on an assessment of Aluminium content.

Application:

This Criterion applies to all Facilities.

- 8.4 **Output Quantities of CoC Material.** Over the given Material Accounting Period the Entity shall use the Input Quantities for each CoC Material to determine the available Quantities of CoC Material for Output, proportional to total Inflows of CoC and Non-CoC Materials, by mass.

Application:

This Criterion applies to all Facilities.

- 8.5 **Indivisibility of CoC Material.** The Output Quantity of CoC Material, which may be a subset of total production, shall be designated as 100% CoC Material.

Application:

This Criterion applies to all Facilities.

- 8.6 **Output Quantity of Eligible Scrap.** If the Entity generates Scrap and wishes to designate the relevant proportion as Eligible Scrap, the Entity shall, for the given Material Accounting Period, use the same percentage share as for its Output of ASI Aluminium.

Application:

This Criterion is only applicable to Entities that produce Pre-Consumer Scrap from their processing and want to designate it as Eligible Scrap as an input to another CoC Certified Entity, accompanied by a CoC Document (see Section 9).

Eligible Scrap criteria are not applicable to Internally Generated Scrap. It only applies when it crosses Certification Scope boundaries.

For CoC Certified Entities it is not required to report quantities of the Internally Generated Scrap under the Criterion 1.7 related to annual CoC Material Flow reporting.

- 8.7 **Consistency Between Input Percentage and Total Output.** The Entity's Material Accounting System shall ensure that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period.

Application:

This Criterion applies to all Facilities.

- 8.8 **Internal Overdraw.** Where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period, but is subject to a Force Majeure situation, the Entity's Material

Accounting System may draw down an Internal Overdraw from the subsequent Material Accounting Period.

- a. The Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period.
- b. The Internal Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure situation.
- c. The Internal Overdraw shall be made up within the subsequent Material Accounting Period.

Application:

This Criterion applies to all Facilities.

8.9 **Positive Balance.** Where an Entity has a Positive Balance of CoC Material at the end of a Material Accounting Period, this may be carried over to the subsequent Material Accounting Period.

- a. The Entity's Material Accounting System must clearly identify any carry over of a Positive Balance.
- b. A Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period shall expire at the end of that Period if not drawn down.

Application:

This Criterion applies to all Facilities.

9. Issuing CoC Documents

*The Mass Balance System is supported by accurate CoC information accompanying shipments of CoC Material. In the **ASI CoC Standard**, the set of required CoC information is referred to as CoC Documents (a template is in Appendix 2 of the **ASI CoC Standard** Guidance). Entities often integrate CoC information into their usual shipment processes, such as sales invoices or shipping documentation. Additional data and information may also be included in CoC Documents at the discretion of the Business but must be accurate and verifiable.*

9.1 **CoC Document.** The Entity shall ensure that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity.

9.2 **CoC Document Content.** The Entity shall ensure that CoC Documents include at least the following information:

- a. Date of issue of the CoC Document.
- b. Reference number for the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes.
- c. The identity, address and CoC Certification number of the Entity issuing the CoC Document.

- d. The identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number.
- e. The responsible employee of the Entity who can verify information in the CoC Document.
- f. A statement confirming that “The information provided in the CoC Document is in Conformance with the **ASI CoC Standard**.”
- g. Type of CoC Material in the shipment.
- h. Mass of CoC Material in the shipment.
- i. Mass of total Material in the shipment.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity.

- 9.3 **Sustainability Data (optional)**. The Entity may also include the applicable Sustainability Data in the CoC Document for that CoC Material:
- a. The average (preferably cradle-to-gate) carbon footprint of the CoC Material and accounting method applied.
 - b. Information to support the origin of Aluminium as per **ASI Performance Standard** Criterion 9.8.
 - c. Recycled content, including methodology regarding Pre-Consumer Scrap and Post-Consumer Scrap, of the CoC Material.

Where engaged in Post-Casthouse activities:

- d. ASI Certification Status for the ASI Performance Standard for the Entity and/or Facility issuing the CoC Document.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity.

- 9.4 **Supplementary Information (optional)**. If the CoC Document includes Supplementary Information about the Entity or CoC Material, the Entity shall ensure that the Supplementary Information can be supported by Objective Evidence.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity and includes Supplementary information in the CoC Documentation.

- 9.5 **Verification of Information**. The Entity shall have systems in place to enable it to respond to reasonable requests for verification of information in CoC Documents issued by the Entity.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity.

9.6 **Error (Shipping).** If an error is discovered after CoC Material has been shipped, the Entity and the receiving party shall document the error and the agreed steps taken to correct it and implement actions to avoid a recurrence.

Application:

This Criterion applies to all Facilities that ship CoC Material to another Entity.

10. Receiving CoC Documents

Entities that receive CoC Material will also receive the accompanying CoC Document (Section 9) issued by their suppliers. Checking and recording this information supports the accuracy and reliability of the Mass Balance System.

10.1 **Verification of CoC Documents.** The Entity shall verify that all required information in received CoC Documents, as set out in Criteria 9.2, 9.3 (optional) and 9.4 (optional), has been included.

Application:

This Criterion applies to all Facilities that receive CoC Material.

10.2 **Verification of Consistency Between CoC Documents and CoC Material.** The Entity shall verify the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System.

Application:

This Criterion applies to all Facilities that receive CoC Material.

10.3 **Verification of Supplier's ASI CoC Certification.** The Entity shall check the ASI website on a regular basis to verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap.

Application:

This Criterion applies to all Facilities that receive CoC Material.

10.4 **Error (Reception).** If an error is discovered after CoC Material or Eligible Scrap has been received, the Entity and the supplying party shall document the error and the agreed steps taken to correct it and implement actions to avoid a recurrence.

Application:

This Criterion applies to all Facilities that receive CoC Material

11. Claims and Communications

CoC Certified Entities are encouraged to communicate with their customers and consumers about their support for responsible supply chains. All marketing and communications claims or representations, beyond what is contained in CoC Documents, are to be consistent with the assurance provided by the relevant ASI Standards and with the ASI Claims Guide.

11.1 **Claims.** Where the Entity makes claims and/or representations about CoC Material outside of CoC Documents the Entity shall have systems in place to ensure that:

- a. These are made in a manner and form consistent with the ASI Claims Guide.
- b. There is verifiable evidence to support the claims and/or representations made.

- c. Appropriate training is provided for relevant employees to properly understand and communicate the claims and/or representations.

Application:

This Criterion applies to all Entities making claims or representations about CoC Material outside of CoC Documents.

Glossary

The Glossary has been moved to the ASI Glossary global document.



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