ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# NOVELIS DO BRASIL LTDA.

CERTIFICATE NUMBER 239

ASI CERTI STANDARD LEVEL CHAIN OF CUSTODY FULL (V1 2017) CERT

CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE
25 NOVEMBER 2022

DATE OF EXPIRY 2 24 NOVEMBER 2025

CERTIFIED SINCE
25 NOVEMBER 2022

AUTHORISED BY

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

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at www.aluminium-stewardship.org

#### CERTIFICATION SCOPE

Novelis Office - São Paulo, Brazil; Novelis Brazil - Pindamonhangaba Facility (Production and Transformation, Aluminum Remelting/Refining, Casthouses, Other manufacturing or sale of products containing Aluminum); Cariacica Distribution Center and the Collection Centers at: Ananindeua, Bauru, Brasília, Campinas, Curitiba, Juiz de Fora, Parnamirim, Pindamonhangaba, Recife, João pessoa, São Paulo, Sertãozinho, Salvador, São Gonçalo (Other manufacturing or sale of products containing Aluminium).

# SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

#### OVERVIEW

| MEMBER NAME                | Novelis Inc.   |
|----------------------------|--|
| ENTITY NAME                | Novelis do Brasil LTDA.  |
| CERTIFICATION<br>SCOPE     | Novelis Office - São Paulo, Brazil;<br>Novelis Brazil - Pindamonhangaba Facility (Production and Transformation,<br>Aluminum Re-melting/Refining, Casthouses, Other manufacturing or sale of<br>products containing Aluminum);<br>Cariacica Distribution Center and the Collection Centers at: Ananindeua,<br>Bauru, Brasília, Campinas, Curitiba, Juiz de Fora, Parnamirim,<br>Pindamonhangaba, Recife, João pessoa, São Paulo, Sertãozinho, Salvador,<br>São Gonçalo (Other manufacturing or sale of products containing<br>Aluminium).  |
| SUPPLY CHAIN<br>ACTIVITIES | <ul><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul>  |
| ASI STANDARD               | Chain of Custody Standard V1   |
| AUDIT TYPE                 | <ul> <li>Initial Certification Audit (17 August – 28 October 2022)</li> </ul>  |
| AUDIT FIRM                 | DNV Business Assurance Services UK Ltd.  |
| AUDIT DATE                 | 17 August – 28 October 2022 (Initial Certification Audit)  |
| AUDIT REPORT<br>SUBMISSION | 9 November 2022 (Initial Certification Audit)  |
| AUDIT SCOPE                | Initial Certification Audit (17 August – 28 October 2022)  |
|                            | The audit scope covers all activities on the Pindamonhangaba site (Brazil)<br>for the production of flat rolled aluminium and Recycling Collection Centres<br>throughout Brazil at: Ananindeua, Bauru, Brasília, Campinas, Curitiba, Juiz<br>De Fora, Parnamirim, Pindamonhangaba, Recife, Salvador, Sertãozinho,<br>São Paulo, João Pessoa, São Gonçalo, Cariacica Distribution Centre and<br>other manufacturings or sale of products containing Aluminium.<br>The ASI multi-site sampling approach was undertaken to include the<br>Collection Centres Brasília, Campinas, Parnamirim, Pindamonhangaba São<br>Paulo, and João Pessoa. |

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

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

| AUDIT<br>OUTCOME        | Certification   |
|-------------------------|---|
| AUDIT<br>METHODOLOGY    | The Auditors confirm that:  |
| DECLARATION             | The information provided by the Entity is true and accurate to the best<br>knowledge of the Auditor(s) preparing this report.   |
|                         | The findings are based on verified Objective Evidence relevant to the<br>time period for the Audit, traceable and unambiguous.  |
|                         | The Audit Scope and audit methodology are sufficient to establish<br>confidence that the findings are indicative of the performance of the<br>Entity's defined Certification Scope. |
|                         | The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.   |
| CERTIFICATION<br>PERIOD | 25 November 2022 – 24 November 2025   |
| NEXT AUDIT<br>TYPE      | Surveillance Audit  |
| NEXT AUDIT<br>DUE DATE  | 24 May 2024   |
| CERTIFICATION<br>NUMBER | 239   |
|                         |   |

## SUMMARY OF FINDINGS

| CRITERION                                   | RATING      | COMMENT  |  |  |
|---|-------------|--|--|--|
| 1 MANAGEMENT SYSTEM AND RESPONSIBILITIES    |             |  |  |  |
| 1.1 ASI membership                          | Conformance | The Entity is a member of ASI since 2015 in the<br>Production & Transformation Class for Standard<br>Performance and the Post-Casthouse for Chain of<br>Custody Standard.<br><u>https://aluminium-stewardship.org/about-asi/asi-<br/>members/novelis-inc</u>   |  |  |
| 1.2 Management system                       | Conformance | The Entity has established a Management System<br>for all Facilities under the Entity's control that have<br>CoC Material Custody. The Entity has developed<br>the operational procedures for managing the Chain<br>of Custody.  |  |  |
| 1.3 Management system reviews               | Conformance | The Entity has developed the operational procedures for managing the Supply Chain Escrow, which is periodically updated to address areas that may generate potential risks of non-compliance.  |  |  |
| 1.4 Management representative               | Conformance | The Entity has appointed the Manager of Quality<br>and Certification as the Management<br>Representative who holds responsibility and<br>authority for compliance with all requirements of the<br>ASI Chain of Custody Standard. The<br>Representative has full support from the ASI<br>Committee, to ensure an integrated view of the<br>organisation, compliance with the criteria and<br>implementation of processes. |  |  |
| 1.5 Training                                | Conformance | The Entity has implemented communication and training measures for all involved with the CoC Certification and promoted the awareness of CoC Certification to employees.   |  |  |
| 1.6 Record keeping                          | Conformance | The Entity has defined in the 'Manual do Sistema<br>Integrado – ASI' ('Integrated System Manual – ASI')<br>that all documents related to the ASI Chain of<br>Custody Standard must be retained for a minimum<br>of five years.   |  |  |
| 1.7a Reporting to ASI (Inputs and Outputs)  | Conformance | The Entity has defined within its 'Integrated System<br>Manual – ASI' to provide the Input and Output<br>quantities of Material/s CoC throughout the<br>calendar year and report the information within a<br>maximum period of six months after each calendar<br>year to the ASI Secretariat.  |  |  |
| 1.7b Reporting to ASI (Input<br>Percentage) | Conformance | The Entity has defined within its 'Integrated System<br>Manual – ASI', to provide the Input Percentage/s<br>calculated for the calendar year   |  |  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | and report the information within a maximum period<br>of six months after each calendar year to the ASI<br>Secretariat.   |
| 1.7c Reporting to ASI (Positive<br>Balance)            | Conformance    | The Entity has defined within its 'Integrated System<br>Manual – ASI', to determine the maximum positive<br>balance in the calendar year carried over to the<br>subsequent material accounting period (if<br>applicable), and to report the information no later<br>than six months after each calendar year to the ASI<br>Secretariat.                                     |
| 1.7d Reporting to ASI (Internal<br>Overdraw)           | Conformance    | The Entity defined within its 'Integrated System<br>Manual – ASI', to determine the maximum Internal<br>Overdraw within the calendar year (if applicable),<br>and the CoC Material Input Quantity percentage<br>that this represents and report the information no<br>later than six months after each calendar year to<br>the ASI Secretariat.                             |
| 1.7e Reporting to ASI (Eligible<br>Scrap)              | Conformance    | The Entity defined within its 'Integrated System<br>Manual – ASI', the total amount of Eligible Scrap<br>Input, with a breakdown by Post-Consumer Scrap<br>and Pre-Consumption Scrap that is designated as<br>CoC Material supplied directly from a CoC Certified<br>Entity and reports the information within 6 months<br>after each calendar year to the ASI Secretariat. |
| 1.7f Reporting to ASI (ASI Credits from Casthouses)    | Not Applicable | This Criterion is not applicable, as the Entity does not use ASI Credits.   |
| 1.7g Reporting to ASI (ASI Credits purchased)          | Not Applicable | This Criterion is not applicable, as the Entity does not use ASI Credits  |
| 2 OUTSOURCING CONTRACTO                                | R S            |   |
| 2.1 Outsourcing Contractors in CoC Certification Scope | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors.  |
| 2.2a Control of CoC Material                           | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors.  |
| 2.2b No further outsourcing                            | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors.  |
| 2.2c Risk assessment                                   | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors.  |

| CRITERION                           | RATING         | COMMENT  |
|-------------------------------------|----------------|--|
| 2.3 Output Quantity                 | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors. |
| 2.4 Verification and record-keeping | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors. |
| 2.5 Error management                | Not Applicable | This Criterion is not applicable to the Entity's<br>Certification Scope as the Entity does not use<br>Outsourcing Contractors. |

#### 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

| 3.1a CoC Certification Scope –<br>Bauxite Mining      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
|---|----------------|---|
| 3.1b ASI Performance Standard –<br>Bauxite Mining     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.2a CoC Certification Scope –<br>Alumina Refining    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.2b ASI Performance Standard –<br>Alumina Refining   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.3a CoC Certification Scope –<br>Aluminium Smelting  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.3b ASI Performance Standard –<br>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 –<br>Aluminium Re-Melting/Refining  | Conformance | The Entity has defined procedures and systems to<br>ensure that ASI Liquid Metal is sourced from ASI<br>Entities Certified to ASI Performance Standard or<br>within the Entity's CoC Certification Scope.                |
|--|-------------|--|
| 4.1b ASI Performance Standard –<br>Aluminium Re-Melting/Refining | Conformance | The Entity has defined procedures and systems to<br>ensure that ASI Liquid Metal is sourced from ASI<br>Entities Certified to ASI Performance Standard or<br>within the Entity's CoC Certification Scope.                |
| 4.2a Pre-Consumer Scrap and Dross                                | Conformance | The Entity has defined procedures and systems to<br>ensure that Pre-Consumer Scrap and Slag are<br>sourced from ASI Entities Certified to ASI<br>Performance Standard or within the Entity's CoC<br>Certification Scope. |
| 4.2b Post-Consumer Scrap   | Conformance | The Entity has defined procedures and systems to<br>ensure that the Scrap that is eligible in its<br>accounting system is considered only as Post-<br>Consumer and subject to supplier Due Diligence, or                 |

| CRITERION   | RATING         | COMMENT  |  |
|---|----------------|--|--|
|   |                | that the Post-Consumer Scrap comes from ASI<br>Entities Certified to ASI Performance Standard or<br>within the Entity's CoC Certification Scope.   |  |
| 4.3a Supplier records                             | Conformance    | The Entity has defined the method to ensure that all<br>direct Suppliers of Scrap Recycling have a<br>respective record including identity, place of<br>operation and applicable legal documents and<br>consent to meet the requirements of the Supplier<br>Code of Conduct.   |  |
| 4.3b Cash payments                                | Conformance    | The Entity does not make cash payments for any type of supply.   |  |
| 5 CASTHOUSES: CRITERIA FO                         | R ASI ALUMINIU | Μ  |  |
| 5.1a CoC Certification Scope –<br>Casthouses      | Conformance    | The Entity has implemented an ASI Integrated<br>Manual and an established Mass Balance system<br>to ensure that Primary ASI Aluminium and<br>Recycled ASI Aluminium are produced only from<br>foundries that are within the Entity's CoC<br>Certification Scope and/or in which the Entity holds<br>a legal interest and is within the CoC Certification<br>Scope of another CoC Certified Entity.<br>The Entity has demonstrated that post-consumer<br>Recycled Aluminium Materials can be purchased<br>through the Entity's Collection Centres, which are<br>ASI Performance Standard Certified. |  |
| 5.1b ASI Performance Standard –<br>Casthouses     | Conformance    | The Entity has defined procedures and systems to<br>ensure that Primary Aluminium comes from ASI<br>Entities Certified to the ASI Performance Standard.<br>The Entity demonstrates that Recycled Aluminium<br>Materials can be purchased through the Entity's<br>Collection Centres, which are ASI Performance<br>Standard Certified.  |  |
| 5.2 Casthouse Products                            | Conformance    | The Entity has defined its Mass Balance process<br>for the identification of Materials and to ensure<br>identification numbers are printed on an ASI<br>Aluminium can be linked to the Input Quantity of<br>CoC Material for the Material Accounting Period.   |  |
| 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM      |                |  |  |
| 6.1a CoC Certification Scope -<br>Post-Casthouse  | Conformance    | The Entity's plants in operation are included within<br>the Entity's CoC Certification Scope and can<br>receive Certified and Post-consumer materials.<br>Only the Pindamonhangaba site can produce ASI<br>Certified Products.   |  |
| 6.1b ASI Performance Standard -<br>Post-Casthouse | Conformance    | The Entity has defined in the ASI Integrated Manual<br>that ASI Aluminium is produced only by the Entity<br>and/or in an ASI Performance Standard Certified  |  |

| CRITERION  | RATING        | COMMENT   |
|--|---------------|---|
|  |               | Entity or that the manufacturing Entity is in the process of certification in accordance with the ASI Performance Standard.   |
| 6.1c Sourcing ASI Aluminium  | Conformance   | The Entity has established systems to ensure that it<br>produces ASI Aluminium only from an Entity/Facility<br>that supplies ASI Aluminium directly from another<br>ASI Chain of Custody Certified Entity, Collection<br>Centres, through a metal dealer or warehouse<br>where the ASI Certified Entity can provide or verify<br>the associated CoC Document containing the<br>required information.  |
| 7 DUE DILIGENCE FOR NON-C  | OC INPUTS AND | RECYCLABLE SCRAP MATERIAL   |
| 7.1a Responsible sourcing policy<br>(anti-corruption)                          | Conformance   | The Entity has defined a process as part of the<br>supplier approval process to address Anti-<br>Corruption by asking suppliers to submit and accept<br>the Supplier Code of Conduct. The Entity has also<br>implemented an Ethical and Responsible<br>Purchasing Policy.<br><u>https://pt-br.novelis.com/wp-</u><br><u>content/uploads/2021/04/Novelis-Supplier-Code-of-</u><br><u>Conduct-PRB-A4-04292021.pdf</u>   |
| 7.1b Responsible sourcing policy<br>(responsible sourcing)                     | Conformance   | The Entity has defined Responsible Sourcing and<br>Anti-Corruption process, requesting suppliers to<br>submit and accept the Supplier Code of Conduct.<br><u>https://pt-br.novelis.com/wp-</u><br><u>content/uploads/2021/04/Novelis-Supplier-Code-of-</u><br><u>Conduct-PRB-A4-04292021.pdf</u>  |
| 7.1c Responsible sourcing policy (human rights due diligence)                  | Conformance   | The Entity has defined a Responsible Sourcing and<br>an Anti-Corruption process, requesting suppliers to<br>submit and accept the Supplier Code of Conduct,<br>which includes Human Rights.<br><u>https://pt-br.novelis.com/wp-</u><br><u>content/uploads/2021/04/Novelis-Supplier-Code-of-</u><br><u>Conduct-PRB-A4-04292021.pdf</u>   |
| 7.1d Responsible sourcing policy<br>(conflict affected and high risk<br>areas) | Conformance   | The Entity has defined a Responsible Sourcing and<br>Anti-Corruption process, requesting suppliers to<br>submit and accept the Supplier Code of Conduct,<br>which includes Human Rights. The Entity has<br>established an Integrity Program Executive<br>Committee that assesses procurement risks in<br>Conflict-Affected and High-Risk Areas (CAHRAs).<br><u>https://pt-br.novelis.com/wp-</u><br><u>content/uploads/2021/04/Novelis-Supplier-Code-of-</u><br><u>Conduct-PRB-A4-04292021.pdf</u><br><u>https://pt-br.novelis.com/about-us/integridade</u> |

| CRITERION                                   | RATING         | COMMENT   |
|---|----------------|---|
| 7.2 Risk assessment                         | Conformance    | The Entity has assessed the risks of non-<br>compliance with its Responsible Purchasing Policy<br>by suppliers of Non-CoC Materials and Recyclable<br>Scrap, through the Supplier Code of Conduct,<br>Integrity Program, and the supplier's Legal<br>Documentation (Mandatory) assessment.  |
| 7.3 Complaints mechanism                    | Conformance    | The Entity has established a grievance mechanism<br>appropriate to the nature, scale, and impact of the<br>business and which allows all Stakeholders and<br>rightsholders to express concerns about non-<br>compliance with its Responsible Sourcing Policy in<br>its aluminium supply chain. The 'Vox Novelis' is a<br>communication channel for Novelis South America<br>customers and suppliers, the channel is confidential<br>and operated by an independent company to<br>ensure communication security.<br>Email: <u>voxnovelis@linhaetica.com.br</u><br>Phone: 0800-200-7170<br>Website: <u>www.linhaetica.com.br/etica/voxnovelis</u> |
| 8 MASS BALANCE SYSTEM: C                    | OC MATERIAL AI | ND ASI ALUMINIUM  |
| 8.1 Material Accounting System              | Conformance    | The Entity has established a Mass Balance System<br>for Certified materials to control ASI Certified<br>material Inputs and Outputs and determine the<br>Input and Output volumes in the system.  |
| 8.2a Post-Consumer Scrap                    | Conformance    | The Entity has established a Mass Balance System<br>for Certified materials to control ASI Certified<br>material Inputs and Outputs including the amount of<br>Post-Consumer Scrap Input.   |
| 8.2b Pre-Consumer Scrap (total)             | Conformance    | The Entity has established a Mass Balance System<br>for Certified materials to control ASI Certified<br>material Inputs and Outputs including the Input<br>Quantity of Pre-Consumer Scrap and Internal<br>Scrap.  |
| 8.2c Pre-Consumer Scrap (Eligible<br>Scrap) | Conformance    | The Entity has established a Mass Balance System<br>for Certified materials to control ASI Certified<br>material Inputs and Outputs including Pre-<br>consumer Scrap Input Quantity supplied directly<br>from a CoC Certified Entity.   |
| 8.3 Material Accounting Period              | Conformance    | The Entity defined the Accounting system as a period of 12 months within a calendar year.   |
| 8.4 Input Percentage                        | Conformance    | The Entity has established a Mass Balance System<br>to manage and track the ASI certified Aluminium<br>from processing to the customers, which includes<br>the Input Percentage for a given Material<br>Accounting Period.  |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| 8.5 Input Percentage (Aluminium<br>Re-Melting/Refining) | Conformance | The Entity has established a Mass Balance System<br>to manage and track the ASI Certified Aluminium<br>from process to the customers, which includes the<br>Input Percentage for a given Accounting Period.  |
| 8.6 Output Quantity determination                       | Conformance | The Entity has established a Mass Balance System<br>to manage and track the ASI Certified Aluminium<br>through processing to the customers, which<br>includes calculating and recording the Output<br>Quantity.  |
| 8.7 Output Quantity designation                         | Conformance | The Entity has established a Mass Balance System<br>to manage and track the ASI Certified Aluminium<br>through processing to the customers, which<br>includes the Output Quantity of CoC Material. This<br>may be a subset of the total production and<br>designated as 100% CoC Material.   |
| 8.8 Output Quantity - Pre-<br>Consumer Scrap            | Conformance | The Entity has established a Mass Balance System<br>to manage and track the ASI Certified Aluminium<br>through the processing to the customers. The Entity<br>produces Pre-Consumer Scrap from its processes<br>and uses the Incoming Percentage for the 12-<br>month Material Accounting Period to determine the<br>Outgoing Eligible Scrap Amount. |
| 8.9 Outputs not exceed Inputs                           | Conformance | The Entity has established a Mass Balance System<br>to manage and track the ASI Certified Aluminium<br>through processing to the customers, and not<br>exceed the Incoming Percentage applied to the<br>total Input of CoC Material and Eligible Scrap<br>during the Material Accounting Period of 12<br>months.                                     |
| 8.10a Internal Overdraws (not<br>exceed 20%)            | Conformance | The Entity has established the Mass Balance<br>System to ensure the Internal Withdrawal does not<br>exceed 20% of the total CoC Material Input<br>Quantity for Material Accounting within 12 months.   |
| 8.10b Internal Overdraws (not exceed affected amount)   | Conformance | The Entity has implemented an ASI Integrated<br>Manual to manage situations where there is a delay<br>of ASI Aluminium material due to force majeure.<br>The Entity's Material Accounting System is<br>prepared to transfer an Internal Withdrawal to the<br>subsequent Material Accounting Period.  |
| 8.10c Internal Overdraws (period to make up)            | Conformance | The Entity has implemented an ASI Integrated<br>Manual to determine the Criterion that the Internal<br>Overdraw must not exceed 20% of the total amount<br>of CoC Material Input for the Material Accounting<br>Period.  |

| CRITERION                           | RATING      | COMMENT   |
|-------------------------------------|-------------|---|
| 8.11a Positive Balance (carry over) | Conformance | The Entity has defined within its Accounting system<br>for CoC to ensure that the transfer of a Positive<br>Balance can be carried forward to the subsequent<br>accounting period.  |
| 8.11b Positive Balance (expiry)     | Conformance | The Entity has implemented an ASI Integrated<br>Manual and Accounting system to<br>to ensure that the transfer of a Positive Balance can<br>be carried forward to the subsequent accounting<br>period and will expire at the end of that period if not<br>withdrawn.  |
| 9 ISSUING COC DOCUMENTS             |             |   |
| 9.1 Shipments and transfers         | Conformance | The Entity has developed a CoC Document that is<br>sent with all shipments of Certified products, since<br>the materials are accompanied by invoices/delivery<br>notes which contain information about the<br>shipment, such as issuing company, recipient, type<br>of product, net weight shipping, date, and reference<br>number. |
| 9.2a Date of issue                  | Conformance | The Entity has developed a CoC Document that is<br>sent in all shipments of Certified products and<br>contains information about the shipment and the<br>date of issue of the CoC Document.   |
| 9.2b Reference number               | Conformance | The Entity has developed a CoC Document that is<br>sent in all shipments of Certified products and<br>contains the reference number of the CoC<br>Document linked to the Material Accounting System<br>of the Entity for verification purposes.   |
| 9.2c Issuing Entity                 | Conformance | The Entity has developed a CoC Document that is<br>sent with all shipments of Certified products and<br>contains information about the shipment and the<br>Entity that issued the CoC Document.   |
| 9.2d Receiving customer             | Conformance | The Entity has developed a CoC Document that is<br>sent with all Certified products and contains<br>information about the shipment, and the address of<br>the customer who will receive the CoC Document.   |
| 9.2e Responsible employee           | Conformance | The Entity has developed a CoC Document that is<br>sent with all Certified products and contains the<br>data of the responsible employee of the Entity who<br>can verify the CoC Document information at the<br>final destination.  |
| 9.2f Conformance statement          | Conformance | The Entity has developed a CoC Document that is sent with all shipments of Certified products which contains the information: 'The information provided   |

| CRITERION                                       | RATING      | COMMENT   |
|---|-------------|---|
|   |             | in the CoC Document complies with ASI Certified Metal'.   |
| 9.2g Type of CoC Material                       | Conformance | The Entity has developed a CoC Document that is<br>sent in all shipments of CoC Certified products with<br>the CoC Certification number and type of CoC<br>Material in the shipment.  |
| 9.2h Mass of CoC Material                       | Conformance | The Entity has developed a CoC Document that is<br>sent in all shipments of CoC Certified products,<br>which includes the type of Coc Material Mass and<br>Liquid Mass weight, which will be sent to another<br>CoC Certified Entity.   |
| 9.2i Mass of total material                     | Conformance | The Entity has developed a CoC Document that is<br>sent in all shipments of CoC Certified products<br>which contains information about the shipment,<br>such as company issuing, recipient, product type,<br>net shipment weight, date, reference number and<br>Mass of the total material in shipment. |
| 9.3a Sustainability Data (optional)             | Conformance | The Entity has determined it will not be providing<br>Sustainability Data in the CoC Document and will<br>only make it available when requested and agreed<br>with the receiving Entity.  |
| 9.3b Sustainability Data (passing on)           | Conformance | The Entity has determined it will not be providing<br>Sustainability Data in the CoC Document and will<br>only make it available when requested and agreed<br>with the receiving Entity.  |
| 9.3c Post-Casthouse ASI<br>Certification status | Conformance | The Entity has determined it will not be providing<br>Sustainability Data in the CoC Document and will<br>only make it available when requested and agreed<br>with the receiving Entity.  |
| 9.4 Supplementary Information (optional)        | Conformance | The Entity has determined it will not be providing<br>Sustainability Data in the CoC Document and will<br>only make it available when requested and agreed<br>with the receiving Entity.  |
| 9.5 Response to verification requests           | Conformance | The Entity has defined within the 'Integrated<br>System Manual – ASI' that the system to manage<br>requests and information requested by the Entities<br>receiving the Material is via the CoC Documents<br>and invoices issued by the issuing Entity.  |
| 9.6 Error management                            | Conformance | The Entity has defined within the 'Integrated<br>System Manual – ASI', that the process to correct<br>possible non-conformities after sending the CoC<br>Material or eligible scrap, as defined in the Non-<br>Conformity Treatment Procedure.  |

| CRITERION  | RATING         | COMMENT   |  |  |  |
|--|----------------|---|--|--|--|
| 10 RECEIVING COC DOCUMENTS                       |                |   |  |  |  |
| 10.1 Verify required information included        | Conformance    | The Entity has defined a process and has trained employees responsible for verifying the required information.  |  |  |  |
| 10.2 Verify consistency with shipments           | Conformance    | The Entity has defined within the 'ASI Integrated<br>Manual', a system for receiving Primary ASI CoC<br>materials and/or Eligible Scrap that accompanies it<br>before recording the information in the Material<br>Accounting system. The Entity has demonstrated<br>with several simulated tests were conducted to<br>receive Certified material at the units that are in the<br>scope of certification. |  |  |  |
| 10.3 Verify supplier CoC<br>Certification status | Conformance    | The Entity checks the ASI website regularly to<br>verify the validity and scope of the supplier's ASI<br>CoC Certification for any changes that might affect<br>the status of the supplied CoC Material or Eligible<br>Scrap.   |  |  |  |
| 10.4 Error management                            | Conformance    | The Entity has defined in the 'Integrated System<br>Manual – ASI', the method for correcting possible<br>non-conformities after receipt of the CoC Material<br>or Eligible Scrap, documenting following the<br>qualification, monitoring Suppliers and the<br>registration of 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<br>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.   |  |  |  |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 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 –<br>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<br>– 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.   |
| 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<br>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 COMMUNICAT                                  | ONS            |   |
| 12.1a ASI Claims Guide                                    | Conformance    | The Entity has defined the methodology to ensure<br>that all future claims on CoC Material outside the<br>CoC Documents are made in a manner consistent<br>with the ASI Claims Guide. |
| 12.1b Verifiable evidence                                 | Conformance    | The Entity has established procedures to ensure<br>that it keeps verifiable evidence to support the<br>claims and/or representations made.  |
| 12.1c Employee training                                   | Conformance    | The Entity has defined that appropriate training will<br>be provided for relevant employees to properly<br>understand and communicate claims and/or<br>representations.               |

### **Document Control and Version History**

| Revision | Date             | Notes  |
|----------|------------------|--|
| 0        | 25 November 2021 | Initial Certification Audit – Full Certification   |
| 1        | 23 February 2023 | Text amendment – Corrected the Next Audit Type from Re-Certification Audit to<br>Surveillance Audit. |