

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Aluminium Bahrain B.S.C (Alba)

CERTIFICATE
NUMBER

268

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION
LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

17 APRIL 2023

DATE OF EXPIRY

16 APRIL 2026

CERTIFIED SINCE

17 APRIL 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation at the Alba Calciner and Alba Smelter in Bahrain.

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Aluminium Bahrain
ENTITY NAME	Aluminium Bahrain B.S.C (Alba)
CERTIFICATION SCOPE	Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation at the Alba Calciner and Alba Smelter in Bahrain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
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">23 – 27 October 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 February 2023
AUDIT SCOPE	<p>The audit scope covers the business of production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting, and captive power generation.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 17 April 2023 – 16 April 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 16 April 2024

CERTIFICATE NUMBER 268



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Aluminium Bahrain (Alba) is one of the largest smelters in the world and currently produces over 1.56 million tonnes per annum. It has been in operation for over 50 years and is one of the most significant facilities in the Kingdom of Bahrain. Alba produces high-quality aluminium products in the form of Standard and Value-Added Products (VAP), which are exported to more than 240 global customers. As the first Aluminium smelter in the Middle East, Alba has been a major contributor to the social, industrial and economic development of the Kingdom of Bahrain. Alba consists of six potlines, four power stations providing a total capacity of over 2.2 Gigawatts (GW), three carbon plants, two cast houses, a desalination plant, a calciner plant and a marine terminal with jetty facility. It occupies over 1.2 square kilometres of land in the Askar Industrial Area, approximately 15 kilometres south of Manama. As one of the biggest national companies, Alba employs nearly 3,500 people, with nearly 85 percent of employees being Bahrain nationals.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

OVERALL	
SYSTEMS	High
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member and is in good standing in the Production membership class.
1.2 CoC Management System	Conformance	The Entity has a management system in place that adequately and appropriately addresses all the applicable requirements of the ASI Chain of Custody Standard; more specifically all Facilities within their CoC's Certification Scope that take on custody of Chain of Custody (CoC) Material.
1.3 CoC Management System Monitoring	Conformance	The Entity has ensured that the Management System has been and will continue to be periodically reviewed and updated as the Entity matures in terms of implementation experience. This will include incorporating potential areas of non-conformance that may have been highlighted in prior audits.
1.4 Management Representative	Conformance	The Chief Supply Officer has been appointed with overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has established, defined and implemented a framework to communicate training measures that will ensure relevant personnel are aware of their responsibilities according to the ASI Chain of Custody Standard. Moreover, the Entity has ensured that the relevant personnel all meet a minimum competency threshold.
1.6 Records Management	Conformance	The Entity has maintained an up-to-date registry of all applicable requirements as defined in the ASI Chain of Custody Standard. This registry shall be retained for a minimum of 5 years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity is prepared to report on the Inputs and Outputs of CoC Material to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity is prepared to report on Inputs and Outputs of Eligible Scrap to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity is prepared to report on Inflows and Outflows of Non-CoC Material to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity is prepared to report on Positive Balance Carried Over to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity is prepared to report on Positive Balance used to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity is prepared to report on Internal Overdraw drawn down to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity uses a daily material tracking report. All materials going through the stages of the operation are traceable for Intra-Entity Flows.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.5 Error (Outsourcing Contractor)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.

CRITERION	RATING	COMMENT
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity is engaged in Aluminium smelting, has a valid ASI membership, and has a highly secured smelting Facility that ensures ASI Aluminium is produced from their smelters that are within their Scope of ASI CoC Certification (application).
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity is engaged in Aluminium smelting, has a valid ASI membership and Performance Standard Certificate, and has a highly secured smelting facility that ensures ASI Aluminium is produced from their smelters that are within their Scope of ASI CoC Certification (application).
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity sources all ASI Alumina from other ASI CoC Certified Entities. The Entity also has a clear traceable system to differentiate Alumina coming from CoC (90%) and Non-CoC Certified (10%) certified suppliers.
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity is engaged in producing Casthouse products, has a valid ASI membership and has a highly secured Casthouse Facility that ensures ASI Aluminium is produced from their Casthouses that are within their Scope of ASI CoC Certification (application).
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity is engaged in producing Casthouse products, has a valid ASI membership and Performance Standard Certificate, and has a highly secured Casthouse facility that ensures ASI Aluminium is produced from their Casthouses that are within their Scope of ASI CoC Certification (application).
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity is engaged in producing liquid Aluminium and Casthouse products, has a valid ASI membership and Performance Standard Certificate, and has highly secured smelting and Casthouse Facilities that ensure ASI Aluminium (in liquid form) is produced only from their smelters that are within their Scope of ASI CoC Certification (application).
5.2 Unique Identification	Conformance	The Entity has established systems 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 each specific Material Accounting Period. For liquid metal delivery to downstream customers, traceability is provided through the 'Charge Number' generated from the manufacturing execution system. For cast products, each cast at the time of batching is assigned a 'Cast Number'. Through the Cast Number, an unbroken chain of traceability is established at all stages of manufacturing operations, including backward traceability up to the reduction lines. The Sales Order Position report in SAP/MES shows linkages between a Sales Order with all the Production Orders, Cast Numbers, Quantities in stock and Quantities Delivered.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible Sourcing Policy (Anti-corruption)	Minor Non-Conformance	The Entity has adopted and communicated to the majority of its suppliers and contractors of Non-CoC Material, Recyclable scrap, and CoC Material supplied through a third party, that they at a minimum are compliant with the practices expected to adhere to the Anti-Corruption Policy. However, for a Non-CoC Certified supplier of a main raw material - Alumina, there is no evidence that the policy was adequately received, acknowledged, and properly imposed.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Minor Non-Conformance	The Entity has adopted and communicated to the majority of its suppliers and contractors of Non-CoC Material, Recyclable scrap, and CoC Material supplied through a third party, that they at a minimum are compliant with the practices expected with Responsible Sourcing. However, for a Non-CoC Certified supplier of a main raw material - Alumina, there is no evidence that the policy was adequately received, acknowledged, and properly imposed.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Minor Non-Conformance	The Entity has adopted and communicated to the majority of its suppliers and contractors of Non-CoC Material, Recyclable scrap, and CoC Material supplied through a third party, that they at a minimum are compliant with the practices expected with Human Rights Due Diligence. However, for a Non-CoC Certified supplier of a main raw material - Alumina, there is no evidence that the policy was adequately received, acknowledged, and properly imposed.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Minor Non-Conformance	The Entity has adopted and communicated to the majority of its suppliers and contractors of Non-CoC Material, Recyclable scrap, and CoC Material supplied through a third party, that they at a minimum are compliant with the practices expected with Due Diligence on Conflict-Affected and High-Risk Areas. However, for a Non-CoC Certified supplier of a main raw material - Alumina, there is no evidence that the policy was adequately received, acknowledged, and properly imposed.
7.2 Risk Assessment and Mitigation	Minor Non-Conformance	The Entity has not fully assessed the risks of non-compliance with its Responsible Sourcing Policy, particularly with social safeguards. This is currently being addressed by the Entity.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has implemented an accessible, transparent, understandable, and culturally and gender-sensitive, External Grievance Mechanism (via the Alba Integrity Line), which is adequate to address all relevant stakeholder complaints, grievances and requests for information relating to its operations.
8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established and currently implementing a CoC Management System and a Material Tracking System that safeguards the overall integrity of the CoC Material and the Eligible Scrap Mass Balance (within the Certification Scope). The Entity shares their CoC

CRITERION	RATING	COMMENT
		Material Tracking System with ASI twice a year. This form is dedicated to consolidating data from various departments into one comprehensive tracking sheet. This procedure is a main component in effectively implementing the newly established Alba CoC Management System.
8.2 Material Accounting Period	Conformance	The Entity's specified reporting period is from January 1st to December 31st of each calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments, including Input and Inflow Quantities, into a unified tracking sheet called Alba CoC Material Tracking System. This form is shared with ASI twice a year.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments, including Output Quantities of CoC Material, into a unified tracking sheet called Alba CoC Material Tracking System. This form is shared with ASI twice a year.
8.5 Indivisibility of CoC Material	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system also ensures that the Output quantity of CoC Material, which may be a subset of total production, shall be designated as 100% CoC Material.</p>
8.6 Output Quantity of Eligible Scrap	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system also considers if the Entity generates Scrap and intends 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.</p>
8.7 Consistency Between Input Percentage and Total Output	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system ensures 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.</p>
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all

CRITERION	RATING	COMMENT
		<p>pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>But if it is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that is not exceeding 20% and is made up within the subsequent Material Accounting Period.</p>
<p>8.8b Internal Overdraw (Not exceed force majeure situation)</p>	<p>Conformance</p>	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>But if it is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that is not exceeding 20% and is made up within the subsequent Material Accounting Period.</p>
<p>8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)</p>	<p>Conformance</p>	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>But if it is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that is not exceeding 20% and is made up within the subsequent Material Accounting Period.</p>
<p>8.9a Positive Balance (Carry over)</p>	<p>Conformance</p>	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system ensures that any carry-over of a Positive Balance will be identified if the Entity opts to carry it over to the subsequent Material Accounting Period.</p>
<p>8.9b Positive Balance (Expiry)</p>	<p>Conformance</p>	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system ensures that any carry-over of a Positive Balance will be identified if the Entity opts to carry it over to the subsequent Material Accounting Period and that this Positive Balance may not be further carried over after this subsequent Material Accounting Period.</p>

CRITERION	RATING	COMMENT
9. ISSUING CoC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' with details for the ASI CoC Reporting, Sustainability Data and any additional Supplementary Information that is useful for the receiver.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's documentation related to CoC Aluminium includes Dates of Issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's documentation related to CoC Aluminium includes Reference Numbers.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's documentation related to CoC Aluminium includes Issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's documentation related to CoC Aluminium includes Receiving Customers' details.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's documentation related to CoC Aluminium includes the names and positions of Responsible Employees.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's documentation related to CoC Aluminium includes a statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's documentation related to CoC Aluminium includes the Type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's documentation related to CoC Aluminium includes the Mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's documentation related to CoC Aluminium includes the Mass of total Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's documentation related to CoC Aluminium includes the average (preferably cradle-to-gate) carbon footprint of the CoC Material and the accounting method applied.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity's documentation related to CoC Aluminium includes the Origin of Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) – Objective evidence	Conformance	All documentation related to CoC Aluminium includes objective evidence of supplementary information.
9.5 Verification of Information	Conformance	The Entity's CoC Management System Manual outlines the procedures for responding to verification from all internal and external stakeholders regarding the information presented on all CoC Documents originating from the Entity through existing communication channels.
9.6 Error (Shipping)	Conformance	Through the CoC Management System, the Entity has established a system to ensure that any error that is discovered after CoC Material has been shipped will be documented by both the Entity and the receiving party. Corrective actions to avoid a recurrence will also be implemented and agreed on by the same parties.

10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' with details for CoC Accounting, Documentation and Claims. This includes specific procedures to verify that all required information is received and CoC Documents are complete.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity utilises a Manufacturing Execution System (MES) that verifies the consistency of the CoC Documents along with the accompanying CoC Material or Eligible Scrap before recording information in the CoC Material tracking system.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has regularly monitored the ASI website to verify the validity and scope of its supplier's ASI CoC Certification and monitor any changes that could affect the status of the CoC Material/Eligible Scrap supplied.
10.4 Error (Reception)	Conformance	Through the CoC Management System, the Entity has established a system to ensure that any error that is discovered after CoC Material or Eligible Scrap has been received will be documented by both the Entity and the supplying party. Corrective actions to avoid a recurrence will also be implemented and agreed on by the same parties.

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity is preparing all necessary documentation, procedures, and training programs according to the established 'Alba Chain of Custody Management System Manual' compliant with the ASI CoC Claims Guidelines.
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CRITERION	RATING	COMMENT
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity is preparing all necessary documentation, procedures, and training programs according to the established 'Alba Chain of Custody Management System Manual' compliant with the ASI CoC Claims Guidelines.
11.1c Claims and Communications (Employee training)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity is preparing all necessary documentation, procedures, and training programs according to the established 'Alba Chain of Custody Management System Manual' compliant with the ASI CoC Claims Guidelines.

ASI LIMITATION OF LIABILITY DISCLAIMER

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.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 April 2023	Initial Certification Audit – Full Certification