

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Aluminium Dunkerque

CERTIFICATE NUMBER

163

ASI STANDARD

CHAIN OF  
CUSTODY  
(V2 2022)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

GUTCERT (AFNOR  
GROUP)

DATE OF ISSUE

30 JUNE 2023

DATE OF EXPIRY

29 JUNE 2026

CERTIFIED SINCE

25 NOVEMBER 2021

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  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

The production and sale of  
aluminium by electrolysis of  
alumina in the form of rolling slabs  
and ingots for remelting at  
Aluminium Dunkerque (France) site.

# AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

MEMBER NAME	Aluminium Dunkerque SAS
ENTITY NAME	Aluminium Dunkerque
CERTIFICATION SCOPE	The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque (France) site.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Chain of Custody Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (18 – 22 October 2021)</li><li>Re-Certification Audit and Scope Change (19 – 20 June 2023)</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>18 – 22 October 2021 (Initial Certification Audit)</li><li>19 – 20 June 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 November 2021 (Initial Certification Audit)</li><li>27 June 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 22 October 2021)</u></p> <p>The audit scope covered the Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (19 – 20 June 2023)</u></p> <p>The audit scope covered the Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>

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All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.
  - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
  - The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 30 June 2023 – 29 June 2026

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DUE DATE 29 December 2024

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CERTIFICATE NUMBER 163

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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.

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## ENTITY OVERVIEW

Located in North of France near Dunkirk, the Aluminium Dunkerque plant was founded in 1991. It was purchased by AIP (American Industrial Partners) on 1 October 2021 and is the largest primary aluminium foundry in Europe, with a capacity of approximately 290,000 tonnes per annum from 264 retention cells.

The facility has approximately 730 employees on site with a further 200 contractors engaged on a full-time basis.

The area under management is approximately 65 hectares (ha). The nearest towns are Gravelines and Loon Plage, both located approximately 4 kilometres from the Entity. Nearby sensitive receptors include the Natura 2000 reserve "Bancs de Flandres" and the natural reserve of "Platier d'Oye" located within five few kilometres from the Entity.

Key external stakeholders include the local towns (i.e. Gravelines and Loon Plage), the local authorities, Dunkirk Harbour, and the Site Surveillance Committee (CSS).

## 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
<b>SYSTEMS</b>	Medium
<b>RISKS</b>	Medium
<b>PERFORMANCE</b>	Medium
<b>OVERALL</b>	<b>MEDIUM</b>

## FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	<p>The Entity is an ASI Member committed to complying with ASI's membership obligations and the ASI Complaints Mechanism, refer to: <a href="https://aluminium-stewardship.org/about-asi/members/Aluminium-Dunkerque-SAS">https://aluminium-stewardship.org/about-asi/members/Aluminium-Dunkerque-SAS</a></p> <p>The Entity is in the Production and Transformation class and is also certified to the ASI Performance Standard since 2020.</p>
1.2 CoC Management System	Conformance	<p>The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. Responsibilities and processes are well defined in the Management System. Adequate resources are provided to ensure its effective implementation.</p>
1.3 CoC Management System Monitoring	Conformance	<p>The Entity performs an annual management review including the ASI Chain of Custody Standard requirements, to review and improve the Management System and identify areas of non-conformance. The latest review was undertaken in April 2023.</p>
1.4 Management Representative	Conformance	<p>The Entity has nominated a Management Representative, the Commercial Manager, to have overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.</p>
1.5 Communications and Training	Conformance	<p>The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard.</p> <p>Adequate training is provided to relevant personnel. Interviews during the audit confirmed awareness and competence in the requirements for relevant personnel.</p>
1.6 Records Management	Conformance	<p>The Entity has implemented a procedure to maintain up-to-date records addressing all applicable requirements of the ASI Chain of Custody Standard. According to this procedure, records are kept for a minimum of five years. All records requested during the audit were made available.</p>
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	<p>The Entity has implemented a procedure to periodically report information to the ASI Secretariat, by 30 June of the year following the end of each calendar year.</p> <p>The reporting has been duly performed in March 2023, with Input/Output Quantities of CoC Material over the calendar year.</p>
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	<p>The Entity has implemented a procedure to periodically report information to the ASI Secretariat, by 30th of June of the year following the end of each calendar year.</p> <p>The reporting has been duly performed in March 2023. As remelting is not in the Certification Scope and the Entity has received no Eligible</p>

CRITERION	RATING	COMMENT
		Scrap, zero Input/Output Quantities of Eligible Scrap, over the calendar year have been reported.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Minor Non-Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat, by 30 June of the year following the end of each calendar year.  The reporting has been duly performed in March 2023. All information required has been reported. However, a non-material error regarding Outflow of Non-CoC Material was identified during the audit.
1.7d Reporting to ASI (Positive Balance carried over)	Not Applicable	This Criterion is not applicable, as there is no Positive Balance carried over to the subsequent Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Not Applicable	This Criterion is not applicable, as there has been no Positive Balance used.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Not Applicable	This Criterion is not applicable, as there has been no Internal Overdraw drawn down from the subsequent Material Accounting Period.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat, by 30 June of the year following the end of each calendar year.  The reporting has been duly performed in March 2023, with quantities of CoC Materials (currently none) transferred between supply chain activities within the CoC Certified Entity over the calendar year.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.

CRITERION	RATING	COMMENT
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as there are no Outsourcing Contractors included within the Entity's Certification Scope.
<b>3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM</b>		
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 has systems in place ensuring that ASI Aluminium can be produced only from the Entity's Smelter which is in the Entity's CoC Certification Scope and certified against the ASI Performance Standard.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity has systems in place ensuring that ASI Aluminium can be produced only from the Entity's Smelter which is in the Entity's CoC Certification Scope and certified against the ASI Performance Standard, refer: <a href="https://www.aluminiumdunkerque.fr/certifications">https://www.aluminiumdunkerque.fr/certifications</a>
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is currently not applicable, as the Entity has not yet sourced ASI Alumina.
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
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.

CRITERION	RATING	COMMENT
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.
<b>5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity has systems in place ensuring that ASI Aluminium can be produced from the Casthouse of the Entity, which is within the Entity's Chain of Custody Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity has systems in place ensuring that ASI Aluminium can be produced from the Casthouse of the Entity, which is within the Entity's ASI Performance Standard Certification Scope, refer: <a href="https://www.aluminiumdunkerque.fr/certifications">https://www.aluminiumdunkerque.fr/certifications</a>
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is currently not applicable, as ASI Aluminium has not yet been sourced by the Entity's Casthouse.
5.2 Unique Identification	Conformance	The Material Accounting System of the Entity has systems in place to ensure a unique identification system of slabs/ingots, supported by the Enterprise Resource Planning (ERP) and production systems, and can be linked to the Input Quantity of CoC Material for the Material Accounting Period.
<b>6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM</b>		
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.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has implemented a Responsible Sourcing Policy which addresses environmental, social and governance issues, including a Code of Conduct, a Purchasing Policy and a Sustainable Procurement



CRITERION	RATING	COMMENT
		<p>Charter. The Purchasing Policy and the Sustainable Procurement Charter are available in English and French at:</p> <p><a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These documents address anti-corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas, among other issues.</p> <p>The Entity has communicated its Code of Conduct and Sustainable Procurement Charter to its traders and suppliers.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity has implemented a responsible sourcing Policy addressing environmental, social and governance issues, including a Code of Conduct, a Purchasing Policy and a Sustainable Procurement Charter. The Purchasing Policy and the Sustainable Procurement Charter are available in English and French at:</p> <p><a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These documents address anti-corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas, among other issues.</p> <p>The Entity has communicated its Code of Conduct and Sustainable Procurement Charter to its traders and suppliers.</p>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has implemented a responsible sourcing Policy addressing environmental, social and governance issues, including a Code of Conduct, a Purchasing Policy and a Sustainable Procurement Charter. The Purchasing Policy and the Sustainable Procurement Charter are available in English and French at:</p> <p><a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These documents address anti-corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas, among other issues.</p> <p>The Entity has communicated its Code of Conduct and Sustainable Procurement Charter to its traders and suppliers.</p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has implemented a responsible sourcing Policy addressing environmental, social and governance issues, including a Code of Conduct, a Purchasing Policy and a Sustainable Procurement Charter. The Purchasing Policy and the Sustainable Procurement Charter are available in English and French at:</p> <p><a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These documents address anti-corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas, among other issues.</p> <p>The Entity has communicated its Code of Conduct and Sustainable Procurement Charter to its traders and suppliers.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity has assessed and documented the risks of non-compliance with its responsible sourcing Policy for its direct suppliers and traders. A mitigation plan is also documented. Since the previous audit, the Entity has improved its supplier risk analysis.</p>

CRITERION	RATING	COMMENT
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has established an appropriate Complaints Resolution Mechanism through various procedures and tools (such as intranet, website), in accordance with the ASI Performance Standard.</p> <p>External parties can raise their concerns about non-compliance with the responsible sourcing Policy through the contact page of the Entity's website:</p> <p><a href="https://www.aluminiumdunkerque.fr/contact-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/contact-aluminium-dunkerque</a></p> <p>A whistleblowing line is available through the Sustainable Procurement Charter, available at:</p> <p><a href="https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select">https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select</a></p> <p>A more direct access will be provided after the redesign of the website in 2023.</p>

## 8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Minor Non-Conformance	The Entity has built upon its ERP software to implement a Material Accounting System, with specific instructions to safeguard the integrity of CoC Material within the Certification Scope. As there has been no sourcing or transfer of CoC Material to date, only simulations of the Material Accounting System have been performed before and during the audit. Results of these simulations have been satisfactory. Metrological controls on the scales used for the mass balance system are properly implemented. However, some metrological documentation is missing for one minor scale.
8.2 Material Accounting Period	Conformance	The Entity has defined a Material Accounting Period of twelve months (from 01/01 to 31/12), as defined in the Entity's general CoC procedure.
8.3 Input and Inflow Quantities	Conformance	The Entity has recorded in its Mass Balance System, over the defined Accounting Period, the Input Quantities of CoC Materials and non-CoC Materials. There has been no Inflow of recyclable/Eligible Scrap material in the Certification Scope to date.
8.4 Output Quantities of CoC Material	Conformance	The Entity has used over the defined Material Accounting Period, the Input Quantities of each CoC Material to define the available Quantities of CoC Material for Output, proportional to total Inflows of CoC and Non-CoC Materials, by mass.
8.5 Indivisibility of CoC Material	Conformance	As defined in the Entity's general CoC procedure, the Entity has established that the Output Quantity of CoC Material is designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable, as the Entity does not designate Pre-Consumer Scrap as Eligible Scrap.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has implemented a procedure to check that the total Output of CoC Material does not proportionally exceed the Input Percentage as applied to total Input of CoC Material over the Material Accounting Period.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure Internal Overdraws do not exceed 20% of total Input Quantity of CoC Material within the Material Accounting Period, in the case of a Force Majeure situation. A specific rule developed for the Material Accounting System software prevents the Overdraw from exceeding 20% which was tested during the audit. There has been no Internal Overdraw to date.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	In a Force Majeure situation, the Entity has defined that the ASI responsible employee would ensure that the Internal Overdraw does not exceed the amount of CoC Material affected by the Force Majeure situation. There has been no Force Majeure or Internal Overdraw situations to date.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Material Accounting System is designed to ensure that, in a Force Majeure situation, the Internal Overdraw would be made up within the subsequent Material Accounting Period. There has been no Internal Overdraw to date.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System is designed to ensure that any carry over of a Positive Balance is clearly identified.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of Output CoC Material at the end of the Material Accounting Period would be carried over to the subsequent period and that any carry over would expire at the end of that Period if not drawn down. It is defined in the Entity's general CoC procedure and clearly integrated within the Material Accounting System of the Entity.

## 9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity has defined in its general CoC procedure and specific instructions, that every shipment will be accompanied by a CoC Document. The template of this CoC Document is available. There has been no shipment or transfer to date.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity has included the date of issue of the CoC Document, in its CoC Document template.
9.2b CoC Document Content (Reference number)	Conformance	The Entity has included a reference number in the CoC Document template, that can be linked to the Entity's Material Accounting System.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity has included the identity, address and CoC Certification number of the Entity issuing the CoC Document in the CoC Document template.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity has included the identity, address and CoC Certification number (if any) of the customer receiving the CoC Material in the CoC Document template.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has included the name of the responsible employee of the Entity who can verify information in the CoC Document in its CoC Document template.

CRITERION	RATING	COMMENT
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has included the statement "the information provided in the CoC Document is in conformance with the ASI CoC Standard" in its CoC Document template.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity has included in its CoC Document template, the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity has included the mass of CoC Material in the shipment in its CoC Document template.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity has included the mass of total Material in the shipment in its CoC Document template.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity has decided to include in its CoC Document template, the average intensity of GHG emissions of its production of ASI Aluminium. The accounting method applied is also included.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable, as the Entity does not include information to support the origin of Aluminium in its CoC Documents for shipment.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Supplementary Information on the Entity's GHG emissions have been included in the CoC Document which is supported by objective evidence.
9.5 Verification of Information	Conformance	The Entity has defined the responsibilities and procedures to respond to requests for verification of information in CoC Documents issued by the Entity. There has been no request received to date.
9.6 Error (Shipping)	Conformance	The Entity has defined procedures, including a specific requalification procedure, to handle errors discovered after CoC Material has been shipped. There has been no error identified to date.
<b>10. RECEIVING COC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity has implemented a procedure to verify that all the required information in received CoC Documents has been included. No CoC documents have been received to date.
10.2 Verification of Consistency Between CoC	Conformance	The Entity has implemented a procedure to verify the consistency of received CoC Documents with the accompanying CoC Material prior

CRITERION	RATING	COMMENT
Documents and CoC Material		to recording information in the Material Accounting System. Tonnage controls are performed on each vessel load. No CoC Material has been received to date.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has defined in the general CoC procedure, an annual check of the validity and scope of the supplier's ASI Chain of Custody Certification (for any changes that might affect the status of the supplied CoC Material). There is no CoC Material supplier yet.
10.4 Error (Reception)	Conformance	The Entity has defined procedures to handle errors discovered after CoC Material has been received. No error has been discovered to date.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	<p>The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide.</p> <p>The Entity has only made claims regarding its ASI Certification on its website and on noticeboards. Claims have been made in a manner and form consistent with the ASI Claims Guide.</p>
11.1b Claims and Communications (Verifiable evidence)	Conformance	<p>The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide.</p> <p>The Entity has only made claims regarding its ASI Certification on its website and on noticeboards. Claims have been made in a manner and form consistent with the ASI Claims Guide.</p>
11.1c Claims and Communications (Employee training)	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. As demonstrated through interviews and training records, relevant employees are all trained to understand and communicate claims and/or representations.

### 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	25 November 2021	Issued – Full Certification
1	30 June 2023	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply V2.