

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ELVAL HELLENIC ALUMINIUM INDUSTRY

CERTIFICATE
NUMBER

150

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

9 AUGUST 2021

DATE OF EXPIRY

8 AUGUST 2024

CERTIFIED SINCE

9 AUGUST 2021

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark grey background.

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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

Aluminium Rolling Division of Elvalhacor S.A. for
the facility in Oinofyta, Greece, covering its Re-
melting & Casthouse Facilities, Hot/Cold Rolling,
Coil Coating and Finishing Lines.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	ELVAL Hellenic Aluminium Industry
ENTITY NAME	ELVALHALCOR S.A. - Aluminium Rolling Division
CERTIFICATION SCOPE	Aluminium Rolling Division of Elvalhalcor S.A. for the facility in Oinofyta, Greece, covering its Re-melting & Casthouse Facilities, Hot/Cold Rolling, Coil Coating and Finishing Lines.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (30 June 2021 – 1 July 2021)Surveillance Audit (24 – 28 April 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">30 June 2021 – 1 July 2021 (Initial Certification Audit)24 – 28 April 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 July 2021 (Initial Certification Audit)20 June 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 June 2021 – 1 July 2021)</u></p> <p>The audit scope includes all activities at the: Re-melting & Casthouse operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging at the Oinofyta site.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p>

At the time of the Audit (July 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (24 – 28 April 2023)

The audit scope includes all activities at the: Re-melting & Casthouse operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging at the Oinofyta site.

Supply chain activities included in the Audit Scope:

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

All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

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	9 August 2021 – 8 August 2024
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	8 August 2024
CERTIFICATION NUMBER	150

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Communications from the ASI Secretariat confirm that Elval is a current member and in good standing.
1.2 Management system	Conformance	The Entity has developed a dedicated Management System, including a Chain of Custody (CoC) Material Accounting System, Supply Chain Due Diligence for metals processes, Transfer of CoC Documents, reviews, and error management, which are all aligned to the applicable principles within the ASI Chain of Custody Standard.
1.3 Management system reviews	Conformance	The Entity includes a periodic review procedure in its documentation which determines the scope of the review, the personnel involved and provides the objectives of the review.
1.4 Management representative	Conformance	The Entity has nominated a Management Representative as having overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity has implemented a training program to cover all aspects of the Chain of Custody Standard to ensure relevant personnel are aware of and are competent in their responsibilities under the Chain of Custody Standard. The training program is available to all relevant personnel. Training records are maintained.
1.6 Record keeping	Conformance	All records are securely stored on the Elval Enterprise Resource Planning (ERP) system. The five year records retention requirement is fulfilled.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit.
1.7b Reporting to ASI (Input Percentage)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. The Input Percentage data were verified during the process.
1.7c Reporting to ASI (Positive Balance)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. Positive Balance data were verified during the process.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. It was noted during the accounting period that the Output Quantity did not exceed the Input Quantity.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. The quantity was reported to ASI Secretariat.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. The quantity was reported to ASI Secretariat.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. The quantities were reported to ASI Secretariat.

2 OUTSOURCING CONTRACTORS

2.1 Outsourcing Contractors in Chain of Custody Certification Scope	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2a Control of Chain of Custody Material	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.

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

3.1a Chain of Custody Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a Chain of Custody Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a Chain of Custody Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a Chain of Custody Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity operates its own Re-Melting/Casthouse Facilities, no Liquid Metal comes from any other Facility.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity's ASI Performance Standard Certification Scope (Certificate 82) corresponds to the Entity's Chain of Custody Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity uses its SAP system to account for all incoming materials, including ASI Eligible Scrap. Pre-Consumer Scrap is checked that it is designated as Chain of Custody Material supplied directly from a Chain of Custody Certified Entity or Aluminium recovered from Dross and treated Dross residues that are subject to supplier Due Diligence as required by the Chain of Custody Standard (Section 7). Controls are in place to ensure input information is valid.
4.2b Post-Consumer Scrap	Conformance	The Entity accounts for Eligible Scrap in their Material Accounting System including Post-Consumer Scrap which is subject to supplier Due Diligence required by the Chain of Custody Standard (Section 7) and is assessed by the Entity to be Post-Consumer in origin.
4.3a Supplier records	Conformance	The Entity has systems in place to record the identity, principals, and place/s of operation of all direct suppliers of Recyclable Scrap Material. This is integrated into its ERP system and approved supplier process.
4.3b Cash payments	Not Applicable	This Criterion is not applicable as Entity's Certification Scope does not make cash payments
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a Chain of Custody Certification Scope – Casthouses	Conformance	The Entity's Certification Scope includes its Casthouse. No other Casthouse is used as a production Facility within the Certification Scope of the Entity.

CRITERION	RATING	COMMENT
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity's ASI Performance Standard Certification Scope (Certificate 82) corresponds to its Chain of Custody Certification Scope, covering Casthouse processes.
5.2 Casthouse Products	Conformance	The Entity uses a bar code system in place to ensure that unique identification numbers are physically printed on slabs or written on rolls for all Aluminium produced including ASI Aluminium. This can be linked to the Input Quantity of the Chain of Custody Material for that Material Accounting Period. Every slab and roll are identified and recorded in the SAP system.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Chain of Custody Certification Scope – Post-Casthouse	Conformance	Post-Casthouse Products are only produced within the Entity and all Facilities are included in its Chain of Custody Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity's ASI Performance Standard Certification Scope includes all Post-Casthouse operations.
6.1c Sourcing ASI Aluminium	Conformance	The Entity's Material Accounting Systems within SAP are in place to ensure that eligible Aluminium and associated Chain of Custody documentation can be tracked on all incoming shipments and through the Casthouse to Post-Casthouse products.
7 DUE DILIGENCE FOR NON-CHAIN OF CUSTODY INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has implemented a Supplier Code of Conduct updated in 2023, with includes their business ethics and Anti-Corruption and is available in English and Greek at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has implemented a Supplier Code of Conduct, which communicates the Entity's policy and expectations on Responsible Sourcing. The document is available both in the Greek and English language at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has issued a Supplier Code of Conduct, which includes the requirement for the protection of Human Rights. The document is available both in the Greek and English language at: https://www.elval.com/arxeia//brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf

CRITERION	RATING	COMMENT
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has issued a Supplier Code of Conduct, which includes Labour and Human Rights and their policy on Conflict Minerals and High-Risk Areas, available at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf
7.2 Risk assessment	Conformance	The Entity conducts Due Diligence with its suppliers of Non-Chain of Custody Material and Recyclable Scrap Material to assess the risks of non-compliance with its Responsible Sourcing Policy. It documents the findings. The Entity has identified high risks suppliers, but there is a Due Diligence process in place to undertake adequate risk mitigation to reduce the adverse impacts.
7.3 Complaints mechanism	Conformance	Stakeholders have the means to raise grievances to the Entity through a confidential hotline. The Chain of Custody Document also presents the name of the Responsible Person that is assigned the responsibility to collect all concerns from customers or suppliers of Chain of Custody material, where all contact information is publicly available on the Elval website.
8 MASS BALANCE SYSTEM: CHAIN OF CUSTODY MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System based on its SAP system. The specification and its manual fully describe the functionality of the system and its use. The processes are documented and have been tested with sample data during a trial.
8.2a Post-Consumer Scrap	Conformance	The Entity's Material Accounting System can determine the Input Quantity of Pre and Post-Consumer Scrap.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's Material Accounting System can determine the Input Quantity of Pre and Post-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has developed its ASI Chain of Custody Management System, where the chapter related to Material Accounting System (MAS) maintains an important role. MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of material able to determine the Input Quantity of Pre- and Post-Consumer Scrap, as the Chain of Custody Mass Balance System has prescribed.
8.3 Material Accounting Period	Conformance	The Entity has developed its ASI Chain of Custody Management System, where the chapter related to Material Accounting System (MAS) maintains an important role. According to the Material Accounting System Manual, the Material Accounting Period is set to one calendar year.

CRITERION	RATING	COMMENT
8.4 Input Percentage	Conformance	The Material Accounting System (MAS) developed by the Entity provides an accounting system that can determine the Input Percentage of ASI Chain of Custody Material.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This Criterion is not applicable, as the Entity does not operate a Facility for the re-melting of recyclable scrap only. Re-melting takes place using both recyclable and primary materials as well as alloying elements. The process model includes all the Entity's operations as a single entity and no separate assessment for the Input Percentage was made (one Input Percentage for the whole entity is calculated as used) as agreed with ASI.
8.6 Output Quantity determination	Conformance	The Entity has developed its ASI Chain of Custody Management System, where the chapter related to Material Accounting System (MAS) maintains an important role. The MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of material able to determine the Output Quantity based on the operation of SAP.
8.7 Output Quantity designation	Conformance	The Entity has developed its ASI Chain of Custody Management System, where the chapter related to Material Accounting System (MAS) maintains an important role. The Material Accounting System is based on a Mass Balance Approach, where only Inputs and Outputs are being monitored. The MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of material able to designate the Output Quantity as 100% Chain of Custody Material, based on the use of SAP.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option. The internal scrap is recycled back into the system in a closed loop manner.
8.9 Outputs not exceed inputs	Conformance	The Entity has developed its ASI Chain of Custody Management System, including a Material Accounting System (MAS). MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of material able to determine the Input and Output Quantity and ensure that the total Output of Chain of Custody Material does not proportionally exceed the Input Percentage as applied to the total Input of Chain of Custody Material, based on the SAP operation.
8.10a Internal Overdraws (not exceed 20%)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option and as such has not made provision for overdraws.

CRITERION	RATING	COMMENT
8.10b Internal Overdraws (not exceed affected amount)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option.
8.10c Internal Overdraws (period to make up)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option.
8.11a Positive Balance (carry over)	Conformance	The Entity has developed its ASI Chain of Custody Management System. The Material Accounting System (MAS) developed by the Entity provides an accounting system that can identify any carry over of a Positive Balance, based on the SAP operation.
8.11b Positive Balance (expiry)	Conformance	The Entity has developed its ASI Chain of Custody Management System. The Material Accounting System (MAS) developed by the Entity provides an accounting system that can identify any carry over of a Positive Balance, based on the SAP operation. The positive balance is only transferred to the following Material Accounting Period, where, if not consumed, it expires at the end of it. This control is manual, assured by the ASI Coordinator at the end of each Material Accounting Period.
9 ISSUING CHAIN OF CUSTODY DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has integrated its ASI documentation system into the Company's SAP system. A range of controls ensures that a Chain of Custody Document is prepared accurately to accompany each shipment or transfer of ASI Chain of Custody Material dispatched to other Chain of Custody Certified Entities. The documents are sent electronically by the sales manager and can be printed. The process is automated to reduce the chances of error.
9.2a Date of issue	Conformance	The Entity's Chain of Custody document contains; Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2b Reference number	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification

CRITERION	RATING	COMMENT
		number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2c Issuing Entity	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2d Receiving customer	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2e Responsible employee	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.

CRITERION	RATING	COMMENT
9.2f Conformance statement	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2g Type of Chain of Custody Material	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2h Mass of Chain of Custody Material	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.2i Mass of total material	Conformance	The Entity's Chain of Custody document contains the following: Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via

CRITERION	RATING	COMMENT
		the Entity's ASI 'responsible person' – its ASI coordinator), formal company logo, VAT and company registration numbers, contact details, including of responsible person.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option to include other data with the Chain of Custody Document. It publishes an annual Sustainability Report which contains information on other sustainability metrics including Greenhouse Gas emissions. It also has an LCA available.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to make use of this option to include other data with the Chain of Custody Document. It publishes an annual Sustainability Report which contains information on other sustainability metrics including Greenhouse Gas emissions. It also has an LCA available.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity's certification status is presented on the ASI's website at: https://aluminium-stewardship.org/about-asi/asi-members/elval This link is also present on the Chain of Custody Document that is issued by the Entity.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to include Supplementary Information on the Chain of Custody Document as it provides suitable information in its Sustainability Report: https://www.elval.com/en/sustainability-csr-reports and via account managers.
9.5 Response to verification requests	Conformance	The Entity has implemented a procedure that includes a flow chart and guidance to establish and confirm what is a 'reasonable request' and six scenarios of verification requests, e.g., verification of Chain of Custody quantity - via documentation and then through desktop review and then through the audit.
9.6 Error management	Conformance	The Entity has an error management procedure that can be linked to incoming or outgoing ASI Chain of Custody Material, and this is documented in the transfer of materials procedure. The flow chart shows error identification and root cause analysis and there is also an error log and form for completion. As the system is automated, the risk of error is very low.
10 RECEIVING CHAIN OF CUSTODY DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has training documentation that provides detailed instructions on all the information requirements, where to find it on the document and where to register it

CRITERION	RATING	COMMENT
		on the system. This was verified during interviews with relevant personnel.
10.2 Verify consistency with shipments	Conformance	All materials received are checked against the invoice or the purchase order, based on Standard Operating Procedures.
10.3 Verify supplier Chain of Custody Certification status	Conformance	The Entity's responsible person checks the ASI website on a regular basis to verify the validity and scope of the supplier's ASI Chain of Custody Certification for any changes that might affect the status of the supplied Chain of Custody Material or Eligible Scrap.
10.4 Error management	Conformance	The Entity has implemented a procedure to be followed on the occasion when errors are identified, either on incoming or outgoing Chain of Custody material. All errors are reported in the Error Documentation Form, which also provides room for root cause analysis and corrective actions documentation and follow-up.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a Chain of Custody Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
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 Chain of Custody Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has developed a procedure that prescribes the way that claims are made, in line with the ASI Claims Guide, an assurance mechanism and the way that cases of misconduct are reported to ASI. Based on that, all claims must be approved by the ASI Coordinator who is assigned with the responsibility to apply the ASI Claims Guide and consult with ASI, if needed, using the form.
12.1b Verifiable evidence	Conformance	The Entity has developed a procedure that prescribes the way that claims are made, in line with the ASI Claims Guide, an assurance mechanism and the way that cases of misconduct are reported to ASI. All claims must be approved by the ASI Coordinator who is assigned with the responsibility to apply the ASI Claims Guide and consult with ASI, if needed. To date, the Entity has not made any claims and/or representations about CoC Material outside of CoC Documents.
12.1c Employee training	Conformance	The Entity has a range of materials and a specific training session on communications and claims. The audit confirmed that appropriate training has been provided for relevant employees to properly understand and communicate the claims and/or representations relating to ASI.

Revision	Date	Notes
0	9 August 2021	Initial Certification Audit – Full Certification
1	20 July 2023	Surveillance Audit