

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SPEIRA RECYCLING SERVICES GERMANY GmbH

CERTIFICATE
NUMBER

221

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV RHEINLAND
CERT GmbH

DATE OF ISSUE

25 AUGUST 2022

DATE OF EXPIRY

24 AUGUST 2025

CERTIFIED SINCE

25 AUGUST 2022

AUTHORISED BY

A white, handwritten signature is written on a dark grey background.

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Recycling of aluminium scrap and production of wrought and foundry alloys according to customer specification at Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by Speira Recycling Services Germany GmbH Headquarters in Grevenbroich (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Speira Recycling Services Germany GmbH
ENTITY NAME	REAL ALLOY GERMANY GmbH: All plants (Grevenbroich, Deizisau, Töging) and Europe HQ
CERTIFICATION SCOPE	Recycling of aluminium scrap and production of wrought and foundry alloys according to customer specification at Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by REAL ALLOY Europe Headquarters in Grevenbroich (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V1
ACQUISITION / DIVESTMENT	<p>REAL ALLOY Europe was acquired by Speira on 31 March 2023 and the Entity name was changed to Speira Recycling Services Germany GmbH. As REAL ALLOY Europe was the controlling Entity at the time of the most recent Surveillance Audit was undertaken, 'REAL ALLOY' is referenced in this Report and the company's documents are hyperlinked from the REAL ALLOY website. The Entity is now formally known as Speira Recycling Services Germany GmbH.</p> <p>For all certification transfers to different controlling Entities, ASI requires a Surveillance Audit of the new controlling Entity to be undertaken within 12 months from the transfer of Entity ownership, or a Re-Certification Audit if the current certification period expires within the 12 month provision.</p> <p>All transferred certifications are deemed 'Provisional' until the successful completion of the Surveillance Audit.</p>
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (17 January – 2 June 2022)Scope Change Audit (27 October – 3 November 2022)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">17 January – 2 June 2022 (Initial Certification Audit)27 October – 3 November 2022 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">28 July 2022 (Initial Certification Audit)

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- 22 December 2022 (Scope Change Audit)
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AUDIT SCOPE

Initial Certification Audit (21 – 22 April 2021)

The audit scope included the Deizisau plant, Grevenbroich plant and Europe Headquarters (which manages central strategic, administrative and service functions).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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

Scope Change Audit (27 October – 3 November 2022)

The audit scope included the production and all operations at REAL ALLOY Töging.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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

AUDIT OUTCOME

- Certification

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.

CERTIFICATION PERIOD

25 August 2022 – 24 August 2025

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DUE DATE

30 March 2024

CERTIFICATE NUMBER

221

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is a member of ASI (Production and Transformation class) and has committed to ASI's membership obligations. For further information please refer to the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/real-alloy
1.2 Management system	Conformance	REAL ALLOY Europe's integrated Management System has been designed to specify the internal processes as well as competences and responsibilities to ensure compliance with all applicable requirements of the ASI Chain of Custody Standard. The Entity has implemented a common procedure for the CoC Management System for their sites within the certification scope, which covers all relevant requirements.
1.3 Management system reviews	Conformance	The Entity has established a mechanism for the periodic review and update of the Chain of Custody Management System, in line with the other facets of its integrated Management System. Due to lack of actual CoC Material processed at the time of this initial audit, a formal first review was limited to the CoC system design, not yet the system's performance.
1.4 Management representative	Conformance	REAL ALLOY Europe's Head of Sustainability and Management Systems has overall responsibility and is in charge of the implementation of and compliance with the ASI Chain of Custody Standard requirements. Within the Entity, a team assists with this role. The role and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has prepared and conducted specific training for relevant personnel and has planned CoC-related communication to all employees.
1.6 Record keeping	Conformance	The Entity has implemented a procedure to maintain records covering all applicable requirements of the ASI Chain of Custody Standard for at least the required five year period.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include Input and Output Quantities of CoC Materials over the calendar year.

CRITERION	RATING	COMMENT
		A report has not yet been issued, as at the time of the initial audit, CoC Material was not yet handled by the Entity.
1.7b Reporting to ASI (Input Percentage)	Conformance	The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include Input Percentages calculated for the calendar year. A report has not yet been issued, as at the time of the initial audit, CoC Material was not yet handled by the Entity.
1.7c Reporting to ASI (Positive Balance)	Conformance	The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period. A report has not yet been issued, as at the time of the initial audit, CoC Material was not yet handled by the Entity.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents. A report has not yet been issued, as at the time of the initial audit, ASI COC material was not yet handled by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the Eligible Scrap within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The provisions of the Entity for annual reporting to the ASI Secretariat are suitable. Reporting is designed to include the quantity of ASI Aluminium allocated to ASI Credits in the calendar year.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable, as the Entity is not a Post-Casthouse Entity and does not use ASI Credits.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable, as the Entity does not outsource CoC Material to contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.

CRITERION	RATING	COMMENT
2.2b No further outsourcing	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.
2.5 Error management	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their Certification Scope.

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

3.1a CoC 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 CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC 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 CoC Certification Scope - Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-melting/Refining. The Entity produces ASI Liquid Metal from the Deizisau, Grevenbroich and Töging production plants.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Conformance	Grevenbroich HQ, Grevenbroich plant and Deizisau plant are certified against the ASI Performance Standard. The Töging plant has been audited against the ASI Performance Standard in parallel with this ASI Chain of Custody Standard audit and the scope of the ASI Performance Standard certification has been extended to include the site.

CRITERION	RATING	COMMENT
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has established procedures and processes to verify Pre-Consumer Scrap as designated CoC Material. Internally generated scrap will be re-fed into the production. These quantities are reflected the Entity's Mass Balance System.
4.2b Post-Consumer Scrap	Conformance	All Post-Consumer Scrap is subject to supplier due diligence assessment and is only accounted for as Eligible Scrap when assessed to be post-consumer in origin and an acceptable level of risk has been reached.
4.3a Supplier records	Conformance	The Entity has implemented a process to gather and verify information on Recyclable Scrap suppliers. All suppliers are screened. As a measure to combat money laundering, all scrap purchasing is cashless.
4.3b Cash payments	Conformance	As witnessed by management and confirmed by the annual financial audit report, the Entity has purchased all its metal scrap via bank transfer.

5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a CoC Certification Scope - Casthouses	Conformance	The Entity's Casthouses are within the CoC Certification Scope. All sites within the Entity are owned by REAL ALLOY Europe.
5.1b ASI Performance Standard - Casthouses	Conformance	The Entity has three production sites: Deizisau, Grevenbroich and Töging. Deizisau and Grevenbroich plants have been certified against the ASI Performance Standard (Certificate 135). Töging was audited in parallel with this ASI Chain of Custody Standard audit with a positive result. Please refer to the ASI website's member page for current certification status: https://aluminium-stewardship.org/about-asi/asi-members/real-alloy
5.2 Casthouse Products	Conformance	The Entity has implemented a Material Accounting System that is designed to ensure all Input and Output of CoC Material is identified by unique identification numbers. These numbers are traceable within the Entity's Enterprise Resource Planning (ERP) system. All Output Quantity of ASI CoC Material can be linked to the Input Quantity of CoC Material for a given Material Accounting Period. Solid ASI Aluminium will be stamped with a unique batch number and physically marked as CoC Material.

6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a CoC Certification Scope – Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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CRITERION	RATING	COMMENT
6.1b ASI Performance Standard – Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Sourcing ASI Aluminium	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has communicated its Supplier Sustainability Guideline to all suppliers. The Guideline contains an Anti-Corruption requirement: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/terms-and-conditions/REAL_ALLOY_Supplier_Sustainability_Guideline.pdf
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has communicated its Supplier Sustainability Guideline to all suppliers. The Guideline contains a responsible sourcing requirement: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/terms-and-conditions/REAL_ALLOY_Supplier_Sustainability_Guideline.pdf
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has communicated its Supplier Sustainability Guideline to all suppliers. The Guideline includes a requirement to assess Human Rights related risks: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/terms-and-conditions/REAL_ALLOY_Supplier_Sustainability_Guideline.pdf
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has communicated its Supplier Sustainability Guideline to all suppliers. The Guideline includes a requirement related to Conflict-Affected and High-Risk Areas: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/terms-and-conditions/REAL_ALLOY_Supplier_Sustainability_Guideline.pdf
7.2 Risk assessment	Conformance	The Entity has implemented a procedure to assess the risks of non-compliance with its Supplier Sustainability Guideline. Based on the result, further information is sought and the risk assessment updated. Part of the risk assessment process includes a red flag assessment with regard to Conflict-Affected and High-Risk Areas (which is aligned with the London Metal Exchange (LME) approach).
7.3 Complaints mechanism	Conformance	The Entity has implemented a system to receive and handle feedback, including complaints and grievances

CRITERION	RATING	COMMENT
		by Stakeholders. Options to provide feedback to the Entity are provided on the REAL ALLOY website, refer: https://www.realalloy.com/eu/downloads/terms-and-conditions#
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity's Management System includes a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and non-CoC Material, by mass. The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system.
8.2a Post-Consumer Scrap	Conformance	The Entity's Management System includes a Material Accounting System that records Input Quantity of Post-Consumer Scrap. The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity's Management System includes a Material Accounting System that records Input Quantity of Pre-Consumer Scrap (total). The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity's Management System includes a Material Accounting System that records the Input Quantity of Pre-Consumer Scrap classified as Eligible Scrap, where it is supplied directly from a CoC Certified Entity (where applicable). The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system.
8.3 Material Accounting Period	Conformance	The Entity's procedure describing their Material Accounting System specifies a Material Accounting Period of one year (12 months).
8.4 Input Percentage	Not Applicable	This Criterion is not applicable as the Entity is a remelter.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same. The Input Quantity of Eligible Scrap and Recyclable Scrap Material is based on an assessment of Aluminium content. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.6 Output Quantity determination	Conformance	The Entity has specified to use the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material, by mass. At the time

CRITERION	RATING	COMMENT
		of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.7 Output Quantity designation	Conformance	As written in the Entity's CoC procedure, the Entity has established that the Output Quantity of CoC Material is designated as 100% CoC Material. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.8 Output Quantity - Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable, as the Entity is engaged in remelting of Aluminium scrap and producing Aluminium ingots and liquid metal. All Aluminium scrap created is recycled internally and does not leave the system boundary.
8.9 Outputs not exceed Inputs	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. At the time of the audit, actual CoC Material was not yet handled by the Entity.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure a maximum 20% Overdraw of total Input Quantity of CoC Material occurs within the Material Accounting Period in case of Force Majeure. At the time of the audit, actual CoC Material was not yet handled by the Entity.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by the Force Majeure situation. At the time of the audit, actual CoC Material was not yet handled by the Entity.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period. At the time of the audit, actual CoC Material was not yet handled by the Entity.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is clearly identified. At the time of the audit, actual CoC Material was not yet handled by the Entity.
8.11b 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 will be carried over to the subsequent period and that such carry over will expire at the end of that period if not drawn down. At the time of the audit, actual CoC Material was not yet handled by the Entity.

CRITERION	RATING	COMMENT
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of the Entity's ASI Chain of Custody related procedures, review of 'example' CoC Documents and interviews with personnel. The Entity will include CoC information in the delivery notes.
9.2a Date of issue	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the date of issue.
9.2b Reference number	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC documents includes a reference number.
9.2c Issuing Entity	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the identity, address and COC certification number of the issuer.
9.2d Receiving customer	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the identity, address and COC certification number of the receiving Entity.
9.2e Responsible employee	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the name of the responsible employee.
9.2f Conformance statement	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes a statement confirming that "The information provided in the COC Document is in conformance with the ASI COC Standard."
9.2g Type of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the type of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched

CRITERION	RATING	COMMENT
		to other CoC Certified Entities. The design of the CoC Document includes the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the mass of total material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable, as currently the Entity does not intend to include Sustainability Data in the CoC Document for their CoC Material.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3c Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional)	Conformance	A provision for responding to requests related to CoC Documents is contained in the ASI management procedure. The Entity's ASI Manager is in charge to respond to requests related to CoC Documents.
9.5 Response to verification requests	Conformance	A provision for responding to requests related to CoC Documents is contained in the ASI management procedure. The Entity's ASI Manager is in charge to respond to requests related to CoC Documents.
9.6 Error management	Conformance	The Entity has defined in its ASI management procedure the method for the management of errors regarding CoC Material shipments.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has defined in a procedure the method of verifying received CoC Documents. As there has been no sourcing of CoC Material at the time of the first certification audit, the effectiveness of this verification will be assessed at the next audit.
10.2 Verify consistency with shipments	Conformance	The Entity has defined in their ASI management procedure the method of verifying received CoC Documents. All deliveries are to be verified when entering the site prior being entered in the internal IT system. As there has been no sourcing of CoC Material at the time of the first certification audit, the effectiveness of this verification will be assessed at the next audit.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined a check of the validity and scope of suppliers' ASI CoC Certification status before the first shipment and annually thereafter.

CRITERION	RATING	COMMENT
10.4 Error management	Conformance	The Entity has developed verification steps to review the consistency of received CoC Documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.

CRITERION	RATING	COMMENT
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable to the Entity, as they neither use nor intend to use the Market Credit System.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. The Entity has demonstrated awareness that all ASI-related claims have to be supported by verifiable evidence.
12.1c Employee training	Conformance	Relevant personnel (marketing/communications) have been trained on CoC Material claims.

Document Control and Version History

Revision	Date	Notes
0	25 August 2022	Initial Certification Audit – Full Certification
1	9 February 2023	Scope Change Audit to include the Töging plant.
2	5 September 2023	Transfer of Certification to Speira Recycling Services Germany GmbH following acquisition of Real Alloy Europe – Provisional Certification