# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# BALL CORPORATION

CERTIFICATE NUMBER 73

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

CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR TÜV RHEINLAND CERT GMBH

DATE OF ISSUE 14 FEBRUARY 2023

DATE OF EXPIRY

CERTIFIED SINCE 14 FEBRUARY 2023

AUTHORISED BY

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

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

#### CERTIFICATION SCOPE

The ASI CoC Scope for Ball Beverage Packaging EMEA includes the manufacturing of beverage can bodies at facilities in Austria (Ludesch), Czechia (Ejpovice), Denmark (Fredericia), Egypt (Cairo), Finland (Mantsala), France (Bierne), Germany (Gelsenkirchen), Italy (Nogara), Serbia (Belgrade), Spain (Cabanillas del Campo and La Selva), Sweden (Fosie), Switzerland (Widnau), Turkey (Manisa) and United Kingdom (Milton Keynes and Wakefield).

Manufacturing of beverage can ends at facilities in France (Mont), Ireland (Waterford) and Poland (Lublin).

Manufacturing of beverage can bodies and ends at facilities in India (Taloja and Sricity) and Saudi Arabia (Damman).

Administrative activities in facilities in United Kingdom (Headquarters in Luton) and engineering/quality insurance activities in Tongwell).

# SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

## **OVERVIEW**

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging EMEA (Europe, Middle East and Africa)
CERTIFICATION SCOPE	The ASI CoC Scope for Ball Beverage Packaging EMEA includes the manufacturing of beverage can bodies at facilities in Austria (Ludesch), Czechia (Ejpovice), Denmark (Fredericia), Egypt (Cairo), Finland (Mantsala) France (Bierne), Germany (Gelsenkirchen), Italy (Nogara), Serbia (Belgrade), Spain (Cabanillas del Campo and La Selva), Sweden (Fosie), Switzerland (Widnau), Turkey (Manisa) and United Kingdom (Milton Keynes and Wakefield).
	Manufacturing of beverage can ends at facilities in France (Mont), Ireland (Waterford) and Poland (Lublin).
	Manufacturing of beverage can bodies and ends at facilities in India (Taloja and Sricity) and Saudi Arabia (Damman).
	Administrative activities in facilities in United Kingdom (Headquarters in Luton) and engineering/quality insurance activities in Tongwell).
SUPPLY CHAIN ACTIVITIES	Post-Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul> <li>Initial Certification Audit (13 August – 11 October 2019)</li> <li>Re-Certification Audit and Scope Change (18 January – 17 February 2023)</li> </ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul> <li>13 August – 11 October 2019 (Initial Certification Audit)</li> <li>18 January – 17 February 2023 (Re-Certification Audit and Scope Change)</li> </ul>
AUDIT REPORT SUBMISSION	<ul> <li>14 January 2020 (Initial Certification Audit)</li> <li>7 August 2023 (Re-Certification Audit and Scope Change)</li> </ul>

AUDIT SCOPE	Initial Certification Audit (13 August – 11 October 2019)					
	The scope of the Certification Audit covers Ball Beverage Packaging EMEA (Europe, Middle East and Africa) at the Head Office Luton (United Kingdom) with site visits to Ball Beverage Packaging Belgrade (Serbia), Ball Beverage Packaging Gelsenkirchen (Germany), Ball Beverage Packaging Ludesch (Austria), Ball Beverage Packaging Nogara (Italy) and Ball Beverage Packaging Waterford (Ireland).					
	<ul><li>Supply chain activities included in the audit scope:</li><li>Post-Casthouse</li></ul>					
	All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.					
	Re-Certification Audit and Scope Change (18 January – 17 February 2023)					
	The scope of the Certification Audit comprises Ball Beverage Packaging EMEA (Europe, Middle East and Africa) with its 22 manufacturing plants, the regional headquarter in Luton, United Kingdom (UK) and the technical center in Tongwell, UK. The ASI multi-site sampling approach was undertaken, the audited facilities included Ball Beverage Packaging Head Office Luton, Ball Beverage Packaging Lublin, Ball Beverage Packaging Manisa, Ball Beverage Packaging Milton Keynes, Ball Beverage Packaging Wakefield, Ball Beverage Packaging Widnau and Tongwell, UK.					
	Supply chain activities included in the audit scope:					
	Post-Casthouse					
	All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.					
AUDIT OUTCOME	Certification					
AUDIT METHODOLOGY	The Auditors confirm that:					
DECLARATION	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	14 February 2023 – 13 February 2026					
NEXT AUDIT TYPE	Re-Certification Audit					
	13 February 2026					
NEXT AUDIT DUE DATE	131 Ebidaly 2020					

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT			
1 MANAGEMENT SYSTEM ANI	I MANAGEMENT SYSTEM AND RESPONSIBILITIES				
1.1 ASI membership	Conformance	Ball Corporation has been a member of the Aluminium Stewardship Initiative (ASI) since 2013. The membership is communicated in the sustainability report on the Ball website: <u>https://www.ball.com/sustainability/sustainability-</u> <u>reporting/downloads</u> and on the ASI membership website <u>https://aluminium-stewardship.org/about-asi/asi-</u> <u>members/ball-corporation</u> .			
1.2 Management system	Conformance	The Entity has well-functioning Management Systems implemented with responsibilities both on local and central levels. All Ball Beverage Packaging EMEA sites are certified against ISO 9001 standard. The ASI Chain of Custody requirements are addressed by documented procedures.			
1.3 Management system reviews	Conformance	As confirmed by document review and interviews, Ball Beverage Packaging EMEA and the local Ball Facilities conduct annual management reviews, where the results of internal and external developments, internal and external audits are reviewed.			
1.4 Management representative	Conformance	The Entity has defined the overall responsibility for ASI with the vice president sourcing and a central team, local responsibilities are defined for all sites and documented in the organisational charts.			
1.5 Training	Conformance	The Entity has defined the persons that are relevant for the implementation and functioning of ASI requirements. It has provided training on the requirements of the ASI Performance Standard and the ASI Chain of Custody Standard and has trained all relevant personnel on these requirements.			
1.6 Record keeping	Conformance	Based on legal requirements and the requirements of the ASI Chain of Custody Standard, the Entity has defined the retention time for ASI related documents as five years.			
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity defines in its ASI related quality procedure, to report to the ASI Secretariat within three months after the end of each calendar year all ASI related Input and Output Quantities.			
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity defines in its ASI related quality procedure, to report to the ASI Secretariat within three months after the end of each calendar year all ASI related information, including the Input Percentages calculated for the calendar year.			

CRITERION	RATING	COMMENT
		The annual report contained the required information and was submitted to the ASI Secretariat in time.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity defines in its ASI related quality procedure, to report to the ASI Secretariat within three months after the end of each calendar year all ASI related information, including any positive material balance, if applicable.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity defines in its ASI related quality procedure, to report to the ASI Secretariat within three months after the end of each calendar year all ASI related information, including any Internal Overdraw of the positive material balance, if applicable (Internal Overdraw in 2020 and 2021: 0 metric tons). The annual report contained the required information and was submitted to the ASI Secretariat in time.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity, as it does not engage in Aluminium Re-melting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to purchase ASI Credits from Casthouses.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to purchase ASI Credits from Casthouses.
2 OUTSOURCING CONTRACT	ORS	
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable to the Entity as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.

CRITERION	RATING	COMMENT
2.3 Output Quantity	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record- keeping	Not Applicable	This Criterion is not applicable to the Entity, as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	This Criterion is not applicable to the Entity as there are no Outsourcing Contractors without Chain of Custody Certification that take custody of material for the purposes of further processing, treatment or manufacturing.
3 PRIMARY ALUMINIUM: CRI METAL	TERIA FOR ASI	BAUXITE, ASI ALUMINA AND ASI LIQUID
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: CR	ITERIA FOR EL	IGIBLE SCRAP AND ASI LIQUID METAL
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT	
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
5 CASTHOUSES: CRITERIA F	OR ASI ALUMIN	IIU M	
5.1a CoC Certification Scope – Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
5.1b ASI Performance Standard – Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
6 POST-CASTHOUSE: CRITER	RIA FOR ASI AL	UMINIUM	
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity has all cans and ends plants certified within its scope. It can provide certified products to its customers through its Facilities.	
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity has all cans and ends plants certified within its scope (refer: <u>https://aluminium-</u> <u>stewardship.org/about-asi/members</u> It can provide certified products to its customers through its plants. It sources Aluminium for these products only from certified suppliers.	
6.1c Sourcing ASI Aluminium	Conformance	The Entity is engaging all Aluminium can sheet suppliers to become ASI Certified, thus enabling the Entity to source ASI Certified metal from multiple suppliers and is working towards Ball Corporation's public long-term 2030 goal of having 100% of Aluminium purchased coming from certified sustainable sources. Several of the Entity's suppliers are already certified against ASI Performance and ASI Chain of Custody Standards. The Entity has implemented a mechanism to check upon delivery, if the supplied material is ASI Certified and registers it accordingly for further production to ensure, that ASI Certified products are produced with ASI Certified material.	
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL			
7.1a Responsible sourcing policy (anti-corruption)	Conformance	All of the sites directly supplying Aluminium rolling mills in 2022 have achieved both ASI Performance and ASI Chain of Custody Standards Certification. The Entity has issued and communicated its Supplier Guiding Principles https://www.ball.com/getattachment/92088cce-5835- 4cf6-aee0-4e8504d32f42/Supplier-Guiding-Principles- and-other-exhibits.pdf?lang=en-001 and a Supplier Code of Conduct https://www.ball.com/getattachment/c71c8ea6-cd20- 407d-b4c2-9a788ee19aeb/Supplier-Code-of-	

CRITERION	RATING	COMMENT
		<u>Conduct Final Nov2022.pdf</u> that cover antitrust, Bribery and Anti-Corruption. The principles of these documents must be accepted and signed by all suppliers.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has issued and communicated its supplier guiding principles https://www.ball.com/getattachment/92088cce-5835- 4cf6-aee0-4e8504d32f42/Supplier-Guiding-Principles- and-other-exhibits.pdf?lang=en-001 and a Supplier Code of Conduct https://www.ball.com/getattachment/c71c8ea6-cd20- 407d-b4c2-9a788ee19aeb/Supplier-Code-of- Conduct Final Nov2022.pdf that address responsible sourcing. The principles of these documents must be accepted and signed by all suppliers.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	All of the sites directly supplying Aluminium rolling mills in 2022 have achieved ASI Performance and ASI Chain of Custody Standards Certification. The Entity has issued and communicated its Human Rights Policy <u>https://www.ball.com/sustainability/social- impact/talent-development/human-rights</u> and Supplier Guiding Principles <u>https://www.ball.com/getattachment/92088cce-5835-</u> <u>4cf6-aee0-4e8504d32f42/Supplier-Guiding-Principles-</u> <u>and-other-exhibits.pdf?lang=en-001</u> and a Supplier Code of Conduct <u>https://www.ball.com/getattachment/c71c8ea6-cd20-</u> <u>407d-b4c2-9a788ee19aeb/Supplier-Code-of-</u> <u>Conduct Final Nov2022.pdf</u> ) that address employment practices and human rights. The principles of these documents must be accepted and signed by all suppliers.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	All of the sites directly supplying Aluminium rolling mills in 2022 have achieved ASI Performance and ASI Chain of Custody Standards Certification. The Entity has issued and communicated its Conflict Minerals Policy and elaborated a conflict minerals report (covering Tin, Tungsten, Tantalum and Gold), which are both published on the website: https://www.ball.com/na/vision/sustainability/product- stewardship/supply-chain/responsible-sourcing- framework These address Conflict-Affected and High-Risk Areas and the Entity's expectations towards suppliers of such materials.
7.2 Risk assessment	Conformance	All of the sites directly supplying Aluminium rolling mills in 2022 have achieved ASI Performance Standard and ASI Chain of Custody Standards Certification. The Entity has established a Responsible Sourcing Framework and maintains a Sustainability Category

CRITERION	RATING	COMMENT
		Profile for Aluminium, which lists the most Material risk factors for Aluminium related to environmental, social and governance (ESG), assessing these risks in terms of operational, reputational, and economic impacts.
7.3 Complaints mechanism	Conformance	The Entity communicates in its Business Ethics Code of Conduct <u>https://www.ball.com/getmedia/de857979-</u> <u>052b-47d1-a253-459596ba2e75/Business-Ethics-Code-</u> <u>of-Conduct-2022.pdf</u> (page 30) which describes the multiple ways to submit complaints via compliance hotlines, including country-specific phone numbers. The hotlines can be reached by Ball employees, suppliers and any other external stakeholders. See the Code of Conduct in several languages at: <u>https://www.ball.com/codeofconduct</u>
8 MASS BALANCE SYSTEM:	COC MATERIAL	AND ASI ALUMINIUM
8.1 Material Accounting System	Conformance	The Entity has implemented an IT based Material Accounting System that records Input Quantity and Output Quantity of Chain of Custody material and Non- Chain of Custody material, by mass.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Entity has defined the Material Accounting Period as 12 months.
8.4 Input Percentage	Conformance	The Entity records delivered material as either ASI or non-ASI material. Based on this classification, a report can be generated at the end of each accounting period that shows the weights and percentages of ASI and non- ASI Inflow in the period, using the formula supplied in this Criterion of the ASI Chain of Custody Standard.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Entity records the Inflows of certified and non- certified material. At the end of each accounting period, it calculates the amount of certified and non-certified material and compares it with the ASI and non-ASI Inflows of the period.
8.7 Output Quantity designation	Conformance	As confirmed by document review and interviews, the Entity's Material Accounting System ensures that the Output Quantity of Chain of Custody material, which is a

CRITERION	RATING	COMMENT
		subset of total production, is designated as 100% Chain of Custody Material.
8.8 Output Quantity – Pre- Consumer Scrap	Conformance	As confirmed by interviews and document review, the Entity uses the Input Percentage for the given Material Accounting Period to determine the Output Quantity of Eligible Scrap (Pre-Consumer Scrap from its production processes).
8.9 Outputs not exceed inputs	Conformance	The Entity adopted its Material Accounting System to ensure, that the total Output of Chain of Custody material and Eligible Scrap does not exceed the Input Percentage as applied to the total Input of Chain of Custody material and Eligible Scrap over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has specified a procedure to implement in the event of a Force Majeure situation. The Material Accounting System can carry over an Internal Overdraw (not to exceed 20% of the total Input Quantity of Chain of Custody material) to the subsequent accounting period.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has specified a procedure to implement in the event of a Force Majeure situation. The Material Accounting System can carry over an Internal Overdraw (not to exceed 20% of the total Input Quantity of Chain of Custody material and not to exceed the amount of Chain of Custody material affected by the Force Majeure situation) to the subsequent accounting period.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has specified a procedure to implement in the event of a Force Majeure situation. The Material Accounting System can carry over an Internal Overdraw to the subsequent accounting period but has to be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity has defined in a procedure that in the case of a Positive Balance of Output Chain of Custody material at the end of a Material Accounting Period, this can be carried over to the subsequent Material Accounting Period and expires at the end of the period, if it is not drawn down. Relevant information is reported to ASI in the annual report to the ASI Secretariat.
8.11b Positive Balance (expiry)	Conformance	The Entity has defined in a procedure that in the case of a Positive Balance of Output Chain of Custody material at the end of a Material Accounting Period, this can be carried over to the subsequent Material Accounting Period and expires at the end of the period, if it is not drawn down.

CRITERION	RATING	COMMENT
9.1 Shipments and transfers	Conformance	All shipments are identified and traceable throughout the production process. All shipments are accompanied by delivery notes that identify ASI material and non-ASI Aluminium products and serve as a Chain of Custody document. In addition to the delivery notes, the Entity can generate summary reports for each customer who received ASI material that covers all required data points and information required for ASI documentation.
9.2a Date of issue	Conformance	All delivery notes carry the date of delivery. A summary report is issued during the first week after an accounting period has ended and carries the date of issue of the ASI documentation and dates of delivery.
9.2b Reference number	Conformance	All documentation includes reference numbers that are linked to the Entity's Material Accounting System. Through this number it is possible to verify that ASI Certified material was used.
9.2c Issuing Entity	Conformance	All documentation related to the ASI material carries the identity, address and Chain of Custody certification number of the Entity issuing the Chain of Custody documents.
9.2d Receiving customer	Conformance	All delivery notes carry the identity and the address of the customer. The summary reports sent to customers receiving Chain of Custody material carry the name and Chain of Custody certification number of the Chain of Custody Certified customers.
9.2e Responsible employee	Conformance	All the Entity's shipping documents carry reference numbers to trace back all shipments to the persons who handled the shipments. The Entity issues summary reports for customers who receive Chain of Custody material that carries the names of the responsible employees, who can verify the information in the Chain of Custody documents.
9.2f Conformance statement	Conformance	The summary reports that are sent to the clients receiving Chain of Custody material carry a statement confirming that 'The information provided in the Chain of Custody Document is in conformance with the ASI Chain of Custody Standard'.
9.2g Type of CoC Material	Conformance	The summary report sent to customers receiving ASI material contains information about the type of Chain of Custody material in the shipment.
9.2h Mass of CoC Material	Conformance	The summary report sent to customers who receive ASI material provides information about the mass of Chain of Custody material in the shipment.

CRITERION	RATING	COMMENT
9.2i Mass of total material	Conformance	Summary reports sent to customers receiving ASI material provide information about the mass of Chain of Custody material and of total material in the shipment. The summary informs about the weight of all Aluminium products shipped to the respective customer during the reporting period.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable, as the Entity currently does not plan to provide additional Sustainability Data on Chain of Custody documents.
9.3c Post-Casthouse ASI Certification status	Conformance	The summary reports sent to customers receiving ASI material carry information on the Entity's ASI Certification Status as it relates to both the Performance and Chain of Custody Standards.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable, as the Entity currently does not add Supplementary Information about the Entity or the Chain of Custody material to Chain of Custody documentation for customers.
9.5 Response to verification requests	Conformance	At the time of the audit, the Entity did not receive a request for the verification of information in Chain of Custody documents. Nevertheless, the Entity has implemented a system to manage such requests.
9.6 Error management	Conformance	The Entity has systems in place to handle errors discovered after the Chain of Custody material has been shipped. If an error is discovered after the Chain of Custody material has been shipped, the Entity will document the error and agree on steps with the receiving party to correct it. Detailed analyses are conducted to avoid a recurrence of the error.
10 RECEIVING COC DOCUME	NTS	
10.1 Verify required information included	Conformance	The Entity verifies all information provided by suppliers and feeds it into the electronic database. The verification includes also all the required information in the received Chain of Custody documents. Also, the Entity reviews this information in the periodic overview reports of its suppliers.
10.2 Verify consistency with shipments	Conformance	For each delivery, the Entity verifies the consistency of the received material with the accompanying documents. This is also done with the Chain of Custody material and the Chain of Custody documents before recording the information in the Entity's Material Accounting System.

CRITERION	RATING	COMMENT
10.3 Verify supplier CoC Certification status	Conformance	The Entity regularly reviews the ASI member website to verify the ASI status of its Aluminium suppliers to identify any changes that might affect the status of the supplied ASI material.
10.4 Error management	Conformance	The Entity has systems and procedures in place to inspect incoming goods, to document any findings and to follow up with any non-compliances. If an error is discovered after the Chain of Custody material is received, the Entity will document the error, investigate it together with the supplier and agree on steps to correct the error and avoid the recurrence.

#### 11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.1c No double counting	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2a Date of issue	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2b Reference number	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.2g Quantity	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.

CRITERION	RATING	COMMENT		
11.3c Expiry	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.		
11.3d No re-trading	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.		
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.		
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.		
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable, as the Entity does not apply the ASI Credits system.		
12 CLAIMS AND COMMUNICATIONS				
12.1a ASI Claims Guide	Conformance	The Entity has implemented procedures to ensure that all ASI related claims adhere to the rules and guidance laid out in the ASI Claims Guide. Any on-product claims need to be approved by the Entity's legal department.		
12.1b Verifiable evidence	Conformance	The Entity's Legal department ensures that there is verifiable evidence to support the claims and/or representations made.		
12.1c Employee training	Conformance	The Entity's ASI-related training materials educate relevant employees on how to properly understand and communicate the claims and representations.		

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

Revision	Date	Notes
0	14 February 2020	Issued (Full Certification)
1	22 June 2021	Audit scope corrected to reference the specific Entities audited
2	3 September 2023	Scope Change to include Sricity, India as a transfer of Certificate 168 (certification period validity of 17 December 2021 – 16 December 2024)) and Taloja, India as a transfer of Certificate 172 (certification period validity of 10 January 2022 – 9 January 2025); Scope Change to remove Facilities Argayash, Naro-Fominsk and Vsevolozhsk in Russia; Change of Audit Firm to TÜV Rheinland Cert GmbH A three month extension was granted by ASI to the Entity due to difficulties experienced relating to audit scheduling and auditor availability