

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Constellium

AS&I EXTRUSION SINGEN, AUTOMOTIVE STRUCTURES GOTTMADINGEN AND DAHENFELD

CERTIFICATE NUMBER

112

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED AUDITING
FIRM

GUTCERT (AFNOR
GROUP)

DATE OF ISSUE

29 JANUARY 2024

DATE OF EXPIRY

28 JANUARY 2027

CERTIFIED SINCE

29 JANUARY 2021

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Extrusion plant of Constellium
Singen (Germany) and Automotive
Structure production sites of
Gottmadingen (Germany) and
Dahenfeld (Germany).

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium AS&I Extrusion Singen, Constellium Automotive Structures Gottmadingen and Dahlenfeld
CERTIFICATION SCOPE	Extrusion plant of Constellium Singen (Germany) and Automotive Structure production sites of Gottmadingen (Germany) and Dahlenfeld (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouses
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (30 November – 1 December 2020)• Surveillance Audit (22 June 2022)• Re-Certification and Scope Change Audit (22 January 2024)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">• 30 November – 1 December 2020 (Initial Certification Audit)• 22 June 2022 (Surveillance Audit)• 22 January 2024 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 17 December 2020 (Initial Certification Audit)• 2 November 2022 (Surveillance Audit)• 18 March 2024 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 November – 1 December 2020)</u></p> <p>Includes the extrusion plant of Singen AS&I, and the two downstream plants of Dahlenfeld and Gottmadingen manufacturing car components from extruded profiles.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the audit (November – December 2020), access to facilities was not possible, due to COVID-19 related travel restrictions. Those facilities were audited as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>

Surveillance Audit (22 June 2022)

Includes the extrusion plant of Singen AS&I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

Re-Certification and Scope Change Audit (22 January 2024)

The audit scope covered the extrusion plant of Singen AS&I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.

Supply chain activities included in the Audit Scope:

- Post-Casthouse

All relevant Criteria from 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	29 January 2024 – 28 January 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	28 February 2027
CERTIFICATE NUMBER	112



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

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

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

ENTITY OVERVIEW

Constellium is committed to managing its business in a safe, sustainable, and socially responsible way. This means that they are working to reduce their impact on the environment, invest in the safety and diversity of their employees, support their communities, and extend their commitment to sustainability to their suppliers. Constellium has several plants in Germany that produce Aluminum products for the automotive, industrial, and transportation sectors. These plants use some of the largest extrusion lines in the world to produce high-quality Aluminum profiles that are used to manufacture automotive structural components.

The Singen plant (part of the 'Entity') is one of Constellium's largest plants, and it produces extruded profiles with outstanding dimensions and properties. These profiles are used to make semi-finished products for structural components, such as crash Management Systems. The Singen plant has been certified by the Aluminium Stewardship Initiative (ASI) since 2020.

Constellium's plants in Gottmadingen and Dahenfeld (part of the 'Entity') produce customised Aluminium structural components and crash Management Systems for the automotive industry. The Gottmadingen plant opened in 2000 and has advanced development and prototyping capabilities. The Dahenfeld plant is located centrally within the German automotive industry and produces customised Aluminium structural components and assemblies for automotive manufacturers in Europe. Both plants are ASI Certified.

MATURITY RATINGS

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

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

OVERALL	
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	Constellium (the parent company of the audited Entity "Constellium Singen GmbH") is an active ASI Member (Production and Transformation group), and it has committed to ASI's membership obligations. Further information is available at: https://aluminium-stewardship.org/about-asi/asi-members/constellium
1.2 CoC Management System	Conformance	As confirmed by document review and interviews, the Entity has established a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. It has implemented relevant Policies, systems, procedures, and processes. The Management System includes a robust Material Accounting System based on the Entity's enterprise-resource-planning system.
1.3 CoC Management System Monitoring	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. The latest review was conducted in January 2024. The Management System documents are up to date.
1.4 Management Representative	Conformance	At the group level, the Director of Group Sustainability oversees the implementation of, and conformance with the ASI requirements. Within the Entity, at each site, there is one person responsible for the implementation of the ASI Chain of Custody Standard. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Communications and Training	Conformance	The Entity has prepared and conducted Chain of Custody (CoC) specific training for relevant personnel and has communicated CoC-related information to all employees.
1.6 Records Management	Conformance	The Entity has implemented procedures to maintain up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard for greater than five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust. At the time of the Audit, the latest report submitted was in June 2023. It included the Input and Output quantities of CoC Materials to/from the Certified Entity over the calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. The report included Input and Output quantities of Eligible Scrap to/from the Certified entity over the calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. The report included Inflow and Outflow quantities of Non-CoC Material/s to/from the Certified entity over the calendar year.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust. It included information regarding the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. It included all the required information.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. It included information regarding the maximum Internal Overdraw within the calendar year and the percentage of Input Quantity of CoC Material this represents.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	At the time of the Audit, the latest report submitted was in June 2023. The report contained all the required information.

2. OUTSOURCING CONTRACTORS

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

3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM

3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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CRITERION	RATING	COMMENT
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's system is designed to ensure that it is producing ASI Aluminium only from Facilities that are within its own ASI CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity was Certified against the ASI Performance Standard: https://aluminium-stewardship.org/about-asi/asi-members/constellium Constellium group switched to a global matrix, and the Audit for Performance Standard Re-certification was still ongoing at the time of this ASI Chain of Custody Re-Certification Audit.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has defined that its Post-Casthouse Facilities source ASI Aluminium only from other ASI Certified Entities or via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Aluminium can be identified and can provide a verified Coc Document. At the time of the Audit, ASI Aluminium had only been sourced directly from another ASI CoC Certified Entity, as confirmed through document review.

7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has issued and communicated a Supplier Code of Conduct and a Responsible Supply Chain Management Policy, available in multiple languages at: https://www.constellium.com/sustainability/policies-reports-and-certifications The Supplier Code of Conduct covers business ethics including anti-Corruption, among other topics such as labour and Human Rights, environment, health, safety and energy and sustainable procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has issued and communicated a Supplier Code of Conduct and a Responsible Supply Chain Management Policy, available in multiple languages at: https://www.constellium.com/sustainability/policies-reports-and-certifications The Supplier Code of Conduct covers business ethics including anti-Corruption, among other topics such as labour and Human Rights, environment, health, safety and energy and sustainable procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.

CRITERION	RATING	COMMENT
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has issued and communicated a Supplier Code of Conduct and a Responsible Supply Chain Management Policy, available in multiple languages at: https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>The Supplier Code of Conduct covers business ethics including anti-Corruption, among other topics such as labour and Human Rights, environment, health, safety and energy and sustainable procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent. The Policy on Responsible Supply Chain Management includes a Due Diligence requirement. This is complemented by the requirement for their metal suppliers to undergo an assessment by an independent Third Party.</p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has issued and communicated a Supplier Code of Conduct and a Responsible Supply Chain Management Policy, available in multiple languages at: https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>The Supplier Code of Conduct covers business ethics including anti-Corruption, among other topics such as labour and Human Rights, environment, health, safety and energy and business ethics (including Export/Import restrictions and regulations and sourcing of Conflict Minerals, Dodd Frank Act) and sustainable procurement.</p> <p>Suppliers are required to sign the Supplier Code of Conduct or equivalent.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity has implemented and manages a risk-oriented, documented, Due Diligence process for its suppliers. This process includes the need for measurable risk mitigation in the event of an identified potential or actual adverse impact. The process is described in the Sustainable Sourcing Policy, available at: https://www.constellium.com/sustainability/policies-reports-and-certifications</p>
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has implemented a system to receive and handle feedback, including complaints and grievances of Stakeholders. The main means of contact is via the website at: https://www.constellium.com/contact and the integrity hotline at: https://secure.ethicspoint.com/domain/media/en/gui/58698/index.html which is stated in the Supplier Code of Conduct.</p>
8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>The Entity's Management System includes a Material Accounting System that safeguards the integrity of CoC Material and Eligible Scrap mass balance within the Certification Scope. The Material Accounting System is based on the Entity's enterprise-resource-planning system.</p>
8.2 Material Accounting Period	Conformance	<p>The Entity has specified in writing, that the Material Accounting Period in the Entity's Material Accounting System is 12 months commencing from the first day of the calendar year.</p>

CRITERION	RATING	COMMENT
8.3 Input and Inflow Quantities	Conformance	The Entity's Management System includes a Material Accounting System that records the quantities of each CoC Material and Eligible Scrap Input and the quantities of Non-CoC Material and Recyclable Scrap Material Inflow to the Certification Scope. The inflow quantity of Eligible Scrap and Recyclable Scrap Material is based on an assessment of Aluminium content. The Material Accounting System is based on the Entity's enterprise-resource-planning system.
8.4 Output Quantities of CoC Material	Conformance	The Entity's Management System includes a Material Accounting System that, over the given Material Accounting Period, uses the Input quantities for each CoC Material to determine the available quantities of CoC Material for Output, proportional to total Inflows of CoC and Non-CoC Materials, by mass. The Material Accounting System is based on the Entity's enterprise-resource-planning system.
8.5 Indivisibility of CoC Material	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.
8.6 Output Quantity of Eligible Scrap	Conformance	Until the time of the Audit, the Entity has not designated generated Aluminium scrap as 'Eligible Scrap'. However, the Entity has a system in place which ensures, that for the given Material Accounting Period, for such Eligible Scrap, the same percentage share as for its Output of ASI Aluminium would be used.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has implemented a procedure to check that the total Output of CoC Material does not proportionally exceed the Input Percentage as applied to the total Input of CoC Material over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's material accounting system is designed to ensure that no more than a 20% overdraw of the total Input Quantity of CoC Material will occur within the Material Accounting Period in case of Force Majeure.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by any Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	As confirmed by document review, the Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is identified.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of Output CoC Material at the end of the Material Accounting Period may be carried over to the subsequent period and that any carry over will expire at the end of that period if not drawn down.

CRITERION	RATING	COMMENT
9. ISSUING CoC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity ensures that a CoC Document will accompany 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, the 'dummy' CoC Documents and interviews with personnel. The Entity will include CoC information in a separate accompanying document. Until the time of the Audit, CoC Material has not been dispatched.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity ensures that a CoC Document will accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the date of issue.
9.2b CoC Document Content (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 CoC Document Content (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 Documents includes the identity, address and CoC Certification number of the issuing Entity.
9.2d CoC Document Content (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 Documents includes the identity, address and CoC Certification number of the receiving Entity.
9.2e CoC Document Content (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 Documents includes the name of the responsible employee.
9.2f CoC Document Content (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 Documents includes a statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity 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 the Type of CoC Material in the shipment.
9.2h CoC Document Content (Mass 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 includes the Mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC

CRITERION	RATING	COMMENT
		Certified Entities. The design of the CoC Documents includes the Mass of the total material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity has designed its CoC Document in such a way that applicable Sustainability Data may be included for that CoC Material. The document may state the average carbon footprint of the CoC Material and the accounting method applied.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable to the Entity, they do not intend to state information to support the origin of Aluminium on its Coc Documents. However, the Entity has designed its CoC Document in a format that facilitates applicable Sustainability Data to be included for that CoC material.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity, they do not intend to state the recycled content of the CoC Material on its CoC Documents. However, the Entity has designed its CoC Document in such a way that applicable Sustainability Data may be included for that CoC Material.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity provides information about its ASI Certification Status for the ASI Performance Standard on its CoC Documents.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable, as the Entity does not include Supplementary Information on its CoC Documents.
9.5 Verification of Information	Conformance	Relevant personnel have been trained and are aware of their duties under the ASI Chain of Custody Standard. The system appears to be robust to document verification requests, errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
9.6 Error (Shipping)	Conformance	The Entity has defined in its ASI management procedure the way errors regarding CoC shipments shall be handled (documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence). The Entity's management confirmed that until the time of the Audit, no errors have been reported.

10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity has defined in a procedure and a checklist to verify the received CoC Documents.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has defined in the ASI management procedure how to verify the received CoC Documents against a specific checklist. All deliveries are verified before being entered into the internal SAP system.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has defined a quarterly check of the validity and scope of the supplier's ASI CoC Certification. These checks are documented in a checklist.

CRITERION	RATING	COMMENT
10.4 Error (Reception)	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents. Relevant staff have been trained accordingly. The Entity's approach to error handling for received CoC Documents is the same as for issued CoC Documents. The Entity has defined in its ASI management procedure how to manage errors regarding CoC shipments (including documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence).

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Not Applicable	The Criterion is not applicable to the Entity, as they do not wish to make claims and/or representations about CoC Material outside of CoC Documents.
11.1b Claims and Communications (Verifiable evidence)	Not Applicable	The Criterion is not applicable to the Entity, as they do not wish to make claims and/or representations about CoC Material outside of CoC Documents.
11.1c Claims and Communications (Employee training)	Not Applicable	The Criterion is not applicable to the Entity, as they do not wish to make claims and/or representations about CoC Material outside of CoC Documents.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 March 2021	Initial Certification Audit – Full Certification
1	15 February 2023	Surveillance Audit
2	29 January 2024	Re-Certification and Scope Change Audit – Full Certification