

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Ma'aden Aluminium

CERTIFICATE NUMBER

142

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

14 JULY 2024

DATE OF EXPIRY

13 JULY 2027

CERTIFIED SINCE

14 JULY 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
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

Ma'aden Aluminium includes Bauxite Mining at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs. Also includes Aluminium Re-Melting and manufacturing of flat rolled Products.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Ma'aden Aluminium
ENTITY NAME	Ma'aden Aluminium
CERTIFICATION SCOPE	Ma'aden Aluminium includes Bauxite Mining at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs. Also includes Aluminium re-melting and manufacturing of flat rolled Products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (11– 29 April 2021)• Re-Certification Audit and Scope Change (17 – 20 July 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 11– 29 April 2021 (Initial Certification Audit)• 17 – 20 July 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 18 June 2021 (Initial Certification Audit)• 27 June 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (11– 29 April 2021)</u></p> <p>The Audit Scope includes all activities at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city, Saudi Arabia, including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs, and re-melting & manufacturing of flat rolled Products. The Audit also included processes performed from Head Office.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse

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

At the time of the Audit (April 2021), access to the site at Al-Baitha mine was limited, due to COVID-19 related travel restrictions, however all facilities at the Ras al-Khair industrial city were audited on-site. Therefore, the audit can be considered as a combined desktop and on-site exercise, in accordance with ASI Interim Policy

Re-Certification Audit and Scope Change (17 – 20 July 2024)

The Audit Scope includes all activities at the Al-Baitha Mine as well as operations at Ras al-Khair industrial city, Saudi Arabia, including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs, and re-melting and manufacturing of flat rolled Products. The Audit also included processes performed from Head Office.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

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

AUDIT OUTCOME	Certification
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AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:
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- 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 July 2024 – 13 July 2027
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	16 January 2026
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CERTIFICATE NUMBER	142
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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

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

ENTITY OVERVIEW

Ma'aden Aluminium Company (MAC) (the 'Entity') has developed one of the largest integrated Mining and Aluminium processing complexes in the world. The Mine is located at Al Ba'itha in the North-eastern of Saudi Arabia and the Aluminium processing Facility is located at Ras-Al-Khair, North of Jubail. The integrated complex at Ras-Al-Khair consists of an Alumina Refinery, Aluminium Smelter and rolling mills. The Bauxite is sourced from the Al Ba'itha mine, which includes ore crushing and handling Facilities. The mine produces approximately four million tonnes of Bauxite annually which is transported via the new North-South railway line to Ras-Al-Khair.

The Entity's Refinery processes Bauxite from the Al Ba'itha Mine site continuously and produces smelter-grade Alumina (SGA) at an average base case rate of 1.8 – 2.0 million tonnes per annum (Mtpa).

The Entity's Smelter includes a reduction (Electrolysis) process and a carbon plant. The main purpose of the Carbon Plant is to manufacture pre-baked anodes. The Smelter is an AP37 electrolysis process utilising Aluminium Pechiney (AP 3X) technology and designed to operate up to 370kA. It consists of two potlines with a total of 720 Reduction Cells (Pots) with a capacity of 738,000 tonnes of Liquid Metal.

The Casthouse contains fifteen holding furnaces, three Billets, five Ingots, five Slabs and two re-melt furnaces. All the holding furnaces are operated by natural gas as a combustion system. The rolling mill is located adjacent to the Smelter and is designed to produce Flat Rolled Products (FRP). The project's intended annual total capacity is to commence at around 380 kt. The Facility includes a Can Reclamation Unit, a hot rolling line, a cold rolling line, and a finishing line.

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	The Entity has been a member of ASI since February 2020 under the category of Production and Transformation.
1.2 CoC Management System	Conformance	The Entity has established a Product Stewardship Chain of Custody Management (CoC) System, including material accounting and documentation that adequately and appropriately addresses all of the applicable requirements of the ASI Chain of Custody Standard, covering the Facilities within their CoC's Certification Scope that take custody of ASI Material.
1.3 CoC Management System Monitoring	Conformance	The CoC system has been implemented and the annual management review has been conducted resulting in the current version of the CoC Management System.
1.4 Management Representative	Conformance	The Entity has appointed the Central Environment Manager as the Management Representative with overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has established a training module on ASI CoC requirements and conducted training for concerned employees to make them aware of, and competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity has specified the requirement for the maintenance of records covering all applicable requirements in the Chain Of Custody Material Accounting and Documentation Procedure. Records will be retained for five (5) years. Personnel responsible for maintaining the records have been informed about this requirement.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has specified the requirement to report to the Aluminium Stewardship Initiative (ASI) within three months after the end of each calendar year regarding the Inputs and Outputs of CoC Material. The Entity obtains the data reported to ASI from their Material Accounting Dashboard.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has specified the requirement to report to ASI within three months after the end of each calendar year. The Entity obtains the details of the data reported to ASI from their Material Accounting Dashboard. The Entity may provide further information about Eligible Scrap breakdown by Post-Consumer Scrap and Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity within the calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity's mass balance has been updated with the requirements for Inputs and Outputs of Non-CoC Material. The 2022 report was produced, transmitted on time and uploaded on ElementAL before June 30, 2023.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's mass balance has been updated and any Positive Balance is carried over to the subsequent Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's mass balance has been updated to meet the requirements, with any Positive Balance carried over to the subsequent Material Accounting Period.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has established a management process to monitor and manage Internal Overdraws.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's mass balance has been updated for Intra-Entity Flows. The 2022 report was produced, transmitted on time and uploaded on ElementAL before June 30, 2023.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors within the scope that takes custody of CoC Material for further processing, treatment or manufacturing.

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

3.1a ASI Bauxite (CoC Certification Scope)	Conformance	The Entity produces ASI Bauxite from its own Bauxite mine located at Al-Baitha which is within the Entity's CoC Certification Scope.
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CRITERION	RATING	COMMENT
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity produces ASI Bauxite from its Bauxite mine at Al-Baitha, which is included in the Entity's ASI Performance Standard Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	The Criterion is not applicable as the Entity solely sources Bauxite from its mines.
3.2a ASI Alumina (CoC Certification Scope)	Conformance	The Entity produces ASI Alumina in its refinery which is included in its CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity produces ASI Alumina from its own Alumina refinery, which is included in the Entity's ASI Performance Standard Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	The Criterion is not applicable as the Entity solely sources Bauxite from its mines.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Aluminium in its own Smelter which is included in its CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Aluminium in its own Smelter which is included in the Entity's ASI Performance Standard Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This is currently not applicable as the Entity has its own Aluminium Smelter supplying Molten Metal processed from its own Alumina (sourced from the refinery).
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity is re-melting Aluminium in its 'Can Rec' unit which is located in the Rolling mill and is included in its CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity is Re-melting Aluminium in its 'Can Rec' unit which is located in the Rolling mill and is included in its Performance Standard Certification Scope
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has given a provision in the Material Accounting System to accept eligible and non-Eligible Scrap in the Re-melting process. All non-ASI Scrap has been accounted for. The system also accounts for the Pre-Consumer Scrap returned by its customers as Eligible Scrap, as all material originally supplied by the unit and the Scrap supplier has been subject to Due Diligence.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity receives Post-Consumer Scrap in the form of used beverage cans from various Scrap suppliers globally who are subjected to Due Diligence assessment. The Material Accounting System developed by the company considers Eligible Scrap to be Scrap from suppliers that have undergone a Due Diligence assessment.
4.2c Eligible Scrap (Dross)	Conformance	While the Entity has established the provision for the Input of ASI Pre-Consumer Scrap and non ASI Pre-Consumer Scrap (from Dross) in the Material Accounting System. It was observed that the Material

CRITERION	RATING	COMMENT
		Accounting System has only received internal scrap, which is ASI CoC Certified.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established a system to record the identity and place/s of operation of all direct suppliers of Recyclable Scrap Material. The information is collected via a questionnaire and entered into the Entity's supplier database.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity records all financial transactions with its direct suppliers of Recyclable Scrap material in its financial accounting system. The Entity does not facilitate cash payments for any suppliers, as all payments are undertaken through bank transfers.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Casthouse Products in its own Casthouse which is included within its CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Casthouse Products in its own Casthouse which is included within its ASI Performance Standard Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable as the Entity sources ASI Aluminium from its own Casthouse.
5.2 Unique Identification	Conformance	The Entity has implemented a system to identify its Casthouse Products through a unique identification number which includes a year of production. This number is either physically stamped on Casthouse Products, or printed on the labels placed on the bundle of ingots. This identification number can be linked to the Input Quantity of CoC Material for that Material Accounting Period.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces Post-Casthouse Products such as can and body stock coils and auto sheet coils in its rolling mill which is included in its CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity produces Post-Casthouse Products such as Can Body stock coils and Auto sheet coils in its own Rolling Mill which has been recommended for ASI Performance Standard Certification.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's Rolling Mill produces Aluminium coils from the Aluminium sourced mostly from its own Casthouse which is included in the scope of CoC Certification. The Entity has provisions to declare in case any ingot slabs are purchased from a non-ASI Facility as non-ASI in the Material Accounting System/dashboard. So far, the Entity has purchased slabs from one supplier only who is currently both ASI Performance Standard and CoC Certified.

CRITERION	RATING	COMMENT
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 a Supplier Code of Conduct that addresses anti-Corruption. The Supplier Code of Conduct is communicated to suppliers of Non-CoC Material and recyclable Scrap which they must sign to confirm their acceptance of the code. The Entity has implemented a Due Diligence questionnaire covering training on anti-Corruption for its Non-CoC metal suppliers and Scrap suppliers.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity's Supplier Code of Conduct addresses environmental, social and governance factors. The Supplier Code of Conduct is communicated and accepted by suppliers of Non-CoC Material and recyclable scrap. The Entity has recently adopted a Responsible Sourcing Management System that that was developed by a consulting firm which aligns with the LME Responsible Sourcing requirements.
7.1c Responsible Sourcing Policy (Human Rights Due Diligence)	Conformance	<p>The Entity has documented its Supplier Code of Conduct which covers Human Rights Due Diligence. The Supplier Code Of Conduct is communicated and accepted by suppliers of Non-CoC Material and recyclable Scrap. The Entity has also implemented a CoC Due Diligence questionnaire for these suppliers.</p> <p>The Entity has recently commissioned a private firm to strengthen their Responsible Sourcing and Social Management System in alignment with SA 8000 (Social Accountability International), which covers all major criteria related to Human Rights Due Diligence. The results are due to be shared in the subsequent ASI audits. There have been no cases identified to date wherein violations of any Human Rights were noted that required remediation</p>
7.1d Responsible Sourcing Policy (Conflict-Affected and High-Risk Areas)	Conformance	<p>The Entity does not operate in nor sources material from Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has developed a comprehensive, fit-for-purpose, management framework for responsible sourcing that is aligned with international good practices and will enable the delivery of risk-based Due Diligence across the Entity's supply chain.</p> <p>Risk factors considered include sanctions risks, State-owned entry risks, politically exposed persons risks, enforcement/fines risks & liquidity risks. With the support of an external consultant specialising in building responsible supply chains, the Entity has completed initial data gathering from supply chain mapping, Materiality and risk assessment and identified key risk areas in its supply chain. The assessment is based on key risks identified by the Entity, OECD guidelines, ASI Performance Standard V3 and other relevant industry initiatives and standards.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity has developed a CoC Due Diligence questionnaire for its suppliers of Non-CoC Material and Recyclable Scrap Material which has provision to document the risk of non-compliance with its Responsible Sourcing Policy and mitigation actions.</p> <p>With the support of an external consultant specialising in building responsible supply chains, the Entity has completed initial data gathering from supply chain mapping, Materiality and risk assessment and identified key risk areas in its supply chain. As a result, the Entity</p>

CRITERION	RATING	COMMENT
		has developed and implemented a management procedure to respond to identified risks.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a Whistleblowing Policy for its stakeholders appropriate to the nature and scale of the business. Any stakeholder in the Aluminium supply chain can raise a complaint regarding non-compliance to the Entity's Responsible Sourcing Policy. The system is available through the Entity's website with a toll-free number and email address for raising any complaint.
8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has developed a Material Accounting System capturing data related to the Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The material movement from the Bauxite Mine to the Refinery, Refinery to Smelter, Smelter to Casthouse and Casthouse to Rolling Mill is reflected in the system. The comprehensive Material Accounting System that is in place safeguards the integrity of CoC Material and Eligible Scrap Mass Balance within the Certification Scope.
8.2 Material Accounting Period	Conformance	The Entity has defined the calendar year as the Material Accounting Period for the Coc Material accounting, which is reflected in the material accounting sheet as specified in the Chain Of Custody Material Accounting and Documentation Procedure.
8.3 Input and Inflow Quantities	Conformance	The Entity has developed a Material Accounting System capturing data related to the Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The material movement from the Bauxite Mine to the Refinery, Refinery to Smelter, Smelter to Casthouse and Casthouse to Rolling Mill is reflected in the system.
8.4 Output Quantities of CoC Material	Conformance	The Entity has developed a Material Accounting System capturing data related to the Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The material movement from the Bauxite Mine to the Refinery, Refinery to Smelter, Smelter to Casthouse and Casthouse to Rolling Mill is reflected in the system.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Material Accounting System designates the Output Quantity of CoC Material as 100% CoC.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity does not send Scrap generated in the Rolling Mill to another CoC Facility. Scrap is processed in its own Casthouse, and the internal Material Accounting System considers the Output Quantity of this Scrap as Eligible Scrap based on the Input Percentage.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System has considered the same percentage for calculating the total Output of CoC Material and/or Eligible Scrap as the Input Percentage applied to the total Input of CoC Material and/or Eligible Scrap over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Chain Of Custody Material Accounting and Documentation Procedure ensures that the Internal Overdraw shall not exceed 20% of

CRITERION	RATING	COMMENT
		the total Input Quantity of CoC Material for the Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation procedure ensures that the Internal Overdraw shall 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	Through the Entity's Chain of Custody Material Accounting and Documentation Procedure and ASI Material Accounting dashboard, the Entity has established a system that ensures Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure ensures to identify any carry over of a Positive Balance at the end of a Material Accounting Period, if any.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure ensures that any Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period shall expire at the end of that period if not drawn down.
9. ISSUING COC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has defined the requirement in their Chain Of Custody Material Accounting and Documentation Procedure for a CoC certificate to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Outsourcing Contractors. The format for the CoC Document has been developed and requirements communicated to concerned employees.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including the date of issue of the CoC Document.
9.2b CoC Document Content (Reference number)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including a Reference number for the CoC Documents, which are linked to the Entity's Material Accounting System for verification purposes.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including the details of the issuing Entity's name, address, and certificate number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including the information related to the name, address and CoC Certificate number of the customer receiving the CoC Material.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including the name of the responsible employee of the Entity who verifies information in the CoC Certificate.

CRITERION	RATING	COMMENT
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including 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 facilitates CoC transactions with a CoC Document/Certificate, including the type of CoC Material in the shipment. The type of materials includes ASI Bauxite, ASI Alumina, ASI Liquid Metal, ASI Cold Metal and ASI Aluminium.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including information regarding the weight of the CoC Material and its unit.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity facilitates CoC transactions with a CoC document/certificate, including information regarding the total weight of the Material and its unit of measurement.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable, as the Entity has chosen not to provide Supplementary Information.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable, as the Entity has chosen not to provide Supplementary Information.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable, as the Entity has chosen not to provide Supplementary Information.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate for its Rolling Mill CoC Material, including the ASI Performance Standard Certification Status.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity facilitates CoC transactions with a CoC Document/Certificate, including information related to sustainability. The Entity has maintained the records of GHG emissions, and the information can be supported by objective evidence.
9.5 Verification of Information	Conformance	The Entity ensures to maintain open channels for all interested Stakeholders to verify certain aspects of their operations including all transactions related to CoC Materials and Products. https://www.maadens.com.sg/en/contacts/address
9.6 Error (Shipping)	Conformance	The Entity has an integrated Quality Assurance (QA) Manual that addresses the requirement for Corrective actions to be documented for any non-conformance within its Quality Management System. The Central Environment Team, with the members from the Casthouse and Rolling Mill Departments, are responsible for addressing any non-conformances or errors in CoC Documents according to the procedure to correct and prevent non-conformances or findings in other aspects of operations.

CRITERION	RATING	COMMENT
10. RECEIVING CoC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has not received any CoC Documents at present. However, the Entity has trained personnel to verify the information in the CoC Document received from other Certified CoC Entities, as the responsibility to verify this information has been defined in the Product Stewardship and CoC Material Accounting Documentation Procedure.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has not received any CoC Documents at present. However, the Entity has trained personnel to verify the information in the CoC Document received from other Certified CoC Entities, as the responsibility to verify this information has been defined in the Product Stewardship and CoC Material Accounting Documentation Procedure.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity does not receive material from the CoC Certified Facility and therefore there is currently no need to check the ASI website to verify the validity and scope of the supplier's ASI CoC Certification. The team has trained various personnel on the requirements of the ASI Chain of Custody Standard, including the requirement to verify the supplier's CoC Certification Status when applicable.
10.4 Error (Reception)	Conformance	Through the Product Stewardship and CoC Material Accounting Documentation Procedure, the Entity has established a system to ensure consistent verification of CoC Documents in each transaction. While the Entity emphasises error-proofing in its Integrated Quality Manual, in cases where recording errors are found, corrective actions are implemented by all parties involved to address the issue, and measures are defined to prevent the same error from recurring.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity ensures that the requirements of the ASI Claims Guide are met, that verifiable evidence is provided to support all ASI claims and representations, and that adequate training is provided to employees directly or indirectly involved in understanding and communicating all claims and representations.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity ensures that the requirements of the ASI Claims Guide are met, that verifiable evidence is provided to support all ASI claims and representations, and that adequate training is provided to employees directly or indirectly involved in understanding and communicating all claims and representations.
11.1c Claims and Communications (Employee training)	Conformance	The Entity ensures that the requirements of the ASI Claims Guide are met, that verifiable evidence is provided to support all ASI claims and representations, and that adequate training is provided to employees directly or indirectly involved in understanding and communicating all claims and representations.

ASI LIMITATION OF LIABILITY DISCLAIMER

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

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 July 2021	Initial Certification Audit – Full Certification
1	31 July 2024	Re-Certification Audit and Scope Change from V1 to V2 of the ASI Chain of Custody Standard.
