

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ELVAL Hellenic Aluminium Industry

CERTIFICATE NUMBER

150

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE SERVICES
UK LTD.

DATE OF ISSUE

9 AUGUST 2024

DATE OF EXPIRY

8 AUGUST 2027

CERTIFIED SINCE

9 AUGUST 2021

AUTHORISED BY

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

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

CERTIFICATION SCOPE

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

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	ELVAL Hellenic Aluminium Industry
ENTITY NAME	ELVAL Hellenic Aluminium Industry
CERTIFICATION SCOPE	Aluminium Rolling Division of Elvalhcor S.A. for the facility in Oinofyta, Greece, covering its Re-melting & Casthouse Facilities, Hot/Cold Rolling, Coil Coating and Finishing Lines.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (30 June 2021 – 1 July 2021)Surveillance Audit (24 – 28 April 2023)Re-Certification Audit and Scope Change (9 – 10 September 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">30 June 2021 – 1 July 2021 (Initial Certification Audit)24 – 28 April 2023 (Surveillance Audit)9 – 10 September 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 July 2021 (Initial Certification Audit)20 June 2023 (Surveillance Audit)9 October 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 June 2021 – 1 July 2021)</u></p> <p>The audit scope includes all activities at the: Re-melting & Casthouse operations, Hot Rolling, Cold Rolling, Coil Coating, Finishing Lines and Packaging at the Oinofyta site.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the Audit (July 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p> <p><u>Surveillance Audit (24 – 28 April 2023)</u></p>

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

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (9 – 10 September 2024)

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

Supply chain activities included in the Audit Scope:

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

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

AUDIT OUTCOME

Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

9 August 2024 – 8 August 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DUE DATE

8 August 2027

CERTIFICATE NUMBER

150



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

Elval is the Aluminium rolling division of ElvalHalcor S.A., one of the leading flat rolled Aluminium manufacturers worldwide. For more than 40 years, Elval has been recognised as a significant producer with a broad portfolio of quality products for the packaging, construction, shipbuilding, automotive, energy, industrial and HVAC and refrigeration markets. Through an established global commercial network across 18 countries, Elval exports approximately 80% of its production to more than 60 countries. For more information, please see: <https://www.elval.com/en/about-elval#about-elval-at-a-glance>

ElvalHalcor S.A. operates in the Aluminium and copper segments through its Aluminium rolling division (Elval) and copper and alloy extrusion division (Halcor) businesses (Halcor is outside of the Certification Scope), as well as its subsidiaries, working with over 1,800 employees and a wider contractor network. The Aluminium rolling mill division has the capacity to produce 450,000 tonnes of Aluminium per year and operates a Casthouse, Aluminium hot and cold-rolling divisions and downstream processing for different markets. In 2021, Elval completed the installation of a four-stand tandem Aluminium hot rolling finishing mill, followed by a six high Aluminium cold rolling mill and a new lacquering line. The Entity is situated in an industrial area in Oinofyta Viotias (61 km from Athen's centre).

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	High
RISKS	Medium
PERFORMANCE	High
OVERALL	HIGH

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is a current ASI member and certified under the ASI Performance Standard.
1.2 CoC Management System	Conformance	The Entity has developed a dedicated Management System, including a Chain of Custody (CoC) Material Accounting System, Supply Chain Due Diligence for metals processes, transfer of CoC Documents, reviews, and an error management function, all of which are aligned with the applicable principles within the ASI Chain of Custody Standard.
1.3 CoC Management System Monitoring	Conformance	The Entity's documentation includes a periodic review procedure that determines the scope, personnel involved, and objectives of the review.
1.4 Management Representative	Conformance	The Entity has nominated a 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 implemented a training program addressing all aspects of the Chain of Custody Standard to ensure relevant personnel are aware of, and competent in their responsibilities under the Standard. The training program is available to all relevant personnel, and training records are maintained.
1.6 Records Management	Conformance	The Entity's records are securely stored on the Elval Enterprise Resource Planning (ERP) system, fulfilling the five-year record retention requirement.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the Audit. Quantities are reported to the ASI Secretariat.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the Audit. Quantities are reported to the ASI Secretariat.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity reports ASI Inflow and Outflow quantities of CoC and Non-CoC materials to the ASI Secretariat via the appropriate reporting form, following the end of each calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. Positive Balance data (if any) are reported to the ASI Secretariat.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has appropriately reported to the ASI Secretariat the Positive Balance used.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The readiness of the Material Accounting System to produce reports was confirmed during the audit. During the accounting period, the Output Quantity did not exceed the Input Quantity.

CRITERION	RATING	COMMENT
1.7g Reporting to ASI (Intra-Entity Flows)	Not Applicable	The Entity reports any CoC Material transferred between supply chain activities (as applicable) to the ASI Secretariat via the appropriate reporting form following the end of each calendar year.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable as no Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as no outsourcing contractors are used in the Entity's CoC Certification Scope.
3. PRIMARY ALUMINIUM: CRITERION 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.
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.

CRITERION	RATING	COMMENT
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: CRITERION FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity operates its Re-Melting/Casthouse Facilities and no ASI Aluminium comes from any other Facility.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity's ASI Performance Standard Certification Scope (Certificate 82) corresponds to its Chain of Custody Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity uses its internal SAP system to account for all incoming materials, including ASI Eligible Scrap. Pre-Consumer Scrap is checked to ensure it is designated as Chain of Custody Material supplied directly from a Chain of Custody Certified Entity. Controls are in place to ensure input information is valid.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity accounts for Eligible Scrap in its Material Accounting System, including Post-Consumer Scrap, which is subject to supplier Due Diligence required by the Chain of Custody Standard and is assessed by the Entity to be Post-Consumer in origin.
4.2c Eligible Scrap (Dross)	Conformance	The Entity uses its SAP system to account for all incoming materials, including ASI Eligible Scrap. Aluminium recovered from Dross and treated Dross residues are subject to supplier Due Diligence as required by the Chain of Custody Standard. Controls are in place to ensure input information is valid.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has systems to record the identity, principals, and place/s of operation of all direct suppliers of Recyclable Scrap Material. This is integrated into its ERP system and approved supplier process.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable as the Entity does not make cash payments.
5. CASTHOUSES: CRITERION FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Certification Scope includes its Casthouse. No other Casthouse is used as a production Facility within the Certification Scope of the Entity.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's ASI Performance Standard Certification Scope (Certificate 82) corresponds to its Chain of Custody Certification Scope covering Casthouse processes.

CRITERION	RATING	COMMENT
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has appropriate systems to ensure that ASI Aluminium is appropriately accounted for, with necessary Chain of Custody documentation.
5.2 Unique Identification	Conformance	The Entity uses a barcode system to ensure that unique identification numbers are physically printed on slabs or written on rolls for all Aluminium produced, including ASI Aluminium. This can be linked to the Input Quantity of the Chain of Custody Material for that Material Accounting Period. Every slab and roll are identified and recorded in the SAP system.

6. POST-CASTHOUSE: CRITERION FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Post-Casthouse Products are only produced within the Entity, and all Facilities are included in its Chain of Custody Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity's ASI Performance Standard Certification Scope includes all Post-Casthouse operations.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's Material Accounting System within SAP are in place to ensure that eligible Aluminium and associated Chain of Custody documentation can be tracked on all incoming shipments and through the Casthouse to Post-Casthouse products.

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

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has implemented a Supplier Code of Conduct updated in 2023, which includes their business ethics and Anti-Corruption and is available in both English and Greek at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has implemented a Supplier Code of Conduct, which communicates the Entity's Policy and expectations on Responsible Sourcing. The document is available both Greek and English at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf
7.1c Responsible Sourcing Policy (Human Rights due diligence)	Conformance	The Entity has issued a Supplier Code of Conduct, which includes the requirement to protect Human Rights. The document is available both in Greek and English at: https://www.elval.com/arxeia//brochures/ElvalHalcor-Supplier-Code-of-Conduct-EN-13022020.pdf
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has issued a Supplier Code of Conduct, which includes Labour and Human Rights and their Policy on Conflict Minerals and High-Risk Areas, is available at: https://www.elvalhalcor.com/userfiles/225d38ab-9b23-4522-9e62-a6a900aac8b2/2023_Supplier-Code-of-Conduct-EN_ElvalHalcor.pdf

CRITERION	RATING	COMMENT
7.2 Risk Assessment and Mitigation	Conformance	The Entity conducts Due Diligence with its suppliers of Non-Chain of Custody Material and Recyclable Scrap Material to assess the risks of non-compliance with its Responsible Sourcing Policy and document the findings. The Entity has identified high-risk suppliers, but there is a Due Diligence process in place to undertake adequate risk mitigation to reduce the adverse impacts.
7.3 Complaints Resolution Mechanism	Conformance	Stakeholders can raise grievances to the Entity through a confidential hotline. The Chain of Custody Document also presents the name of the Responsible Person who is assigned the responsibility to collect all concerns from customers or suppliers of Chain of Custody material, where all contact information is publicly available on the Elval website.

8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System (MAS) based on its SAP system. The specification and manual fully describe the system's functionality and use. The processes are documented and were tested with sample data during a trial.
8.2 Material Accounting Period	Conformance	The Entity has developed its ASI Chain of Custody Management System, in which the chapter related to the MAS maintains an important role. According to the Material Accounting System Manual, the Material Accounting Period is set to one calendar year.
8.3 Input and Inflow Quantities	Minor Non-Conformance	The Entity has established a MAS based on its SAP system. The specification and manual fully describe the system's functionality and use. The processes are documented and tested with sample data during a trial.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a MAS based on its SAP system. The specification and manual fully describe the system's functionality and use. The processes are documented and tested with sample data during a trial.
8.5 Indivisibility of CoC Material	Conformance	The Entity has developed its ASI Chain of Custody Management System, where the chapter related to the MAS maintains an important role. The Material Accounting System is based on a Mass Balance Approach, where only Inputs and Outputs are monitored. The MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of material able to designate the Output Quantity as 100% Chain of Custody Material, based on the use of SAP.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable, as the Entity does not wish to use this option. The internal Scrap is recycled back into the system in a closed-loop manner.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has developed its ASI Chain of Custody Management System, including a Material Accounting System (MAS). The MAS developed by the Entity can meet the relevant criteria requirements, providing an accounting system of CoC Material able to determine the Input and Output Quantity and ensure that the total Output of Chain of Custody Material does not proportionally exceed the Input

CRITERION	RATING	COMMENT
		Percentage as applied to the total Input of Chain of Custody Material, based on the SAP operation.
8.8a Internal Overdraw (Not exceed 20%)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to use this option and has not made provision for overdraws.
8.8b Internal Overdraw (Not exceed force majeure situation)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to use this option.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to use this option.
8.9a Positive Balance (Carry over)	Conformance	The Entity has developed its ASI Chain of Custody Management System. The Material Accounting System (MAS) developed by the Entity provides an accounting system that can identify any carryover of a Positive Balance based on the SAP operation.
8.9b Positive Balance (Expiry)	Conformance	The Entity has developed its ASI Chain of Custody Management System. The MAS developed by the Entity provides an accounting system that can identify any carryover of a Positive Balance based on the SAP operation. The positive balance is only transferred to the following Material Accounting Period, where, if not consumed, it expires at the end of it. This control is a manual process which is assured by the ASI Coordinator at the end of each Material Accounting Period.
9. ISSUING COC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has integrated its ASI documentation system into its SAP system. A range of controls ensures that a Chain of Custody Document is prepared accurately for each shipment or transfer of ASI Chain of Custody Material dispatched to other Chain of Custody Certified Entities. The sales manager sends the documents electronically and can print them. The process is automated to reduce the likelihood of any error.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's Chain of Custody document contains the Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified – the Entity should be notified immediately via the Entity's ASI 'responsible person' – its ASI coordinator), formal Entity logo, VAT and Entity registration numbers, contact details, including of responsible person.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's Chain of Custody document contains the Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked

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

CRITERION	RATING	COMMENT
		Entity logo, VAT and Entity registration numbers, contact details, including of responsible person.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's Chain of Custody document contains the Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via the Entity's ASI 'responsible person' - its ASI coordinator), formal Entity logo, VAT and Entity registration numbers, contact details, including of responsible person.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's Chain of Custody document contains the Date, Reference to the Material Accounting System, Entity of production, ASI Certification number, receiving customer name, address and ASI Certification number, contact details of both parties, Chain of Custody material type (in this case ASI Aluminium), conformity statement, the mass of material, the mass of total shipment, disclaimer (which asked if there is an error identified - the Entity should be notified immediately via the Entity's ASI 'responsible person' - its ASI coordinator), formal Entity logo, VAT and Entity registration numbers, contact details, including of responsible person.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable as the Entity addresses sustainability data (carbon footprint) in separate customer documentation.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable as the Entity addresses sustainability data (origin information) in separate customer documentation.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable as the Entity addresses sustainability data (recycled content) in separate customer documentation.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity's certification status is available on the ASI's website at: https://aluminium-stewardship.org/about-asi/asi-members/elval
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable, as the Entity does not wish to include Supplementary Information on the Chain of Custody Documents as it provides suitable information in its Sustainability Report: https://www.elval.com/en/sustainability-csr-reports
9.5 Verification of Information	Conformance	The Entity has implemented a procedure that includes a flow chart and guidance to establish and confirm what is a 'reasonable request' and six scenarios of verification requests, including the verification of Chain of Custody quantity via documentation, desktop review, and audit.
9.6 Error (Shipping)	Conformance	The Entity has an Error Management Procedure that can be linked to incoming or outgoing ASI Chain of Custody Material, which is

CRITERION	RATING	COMMENT
		documented in the Transfer of Materials Procedure. The flow chart illustrates error identification and root cause analysis, and also contains an error log and form for completion. As the system is automated, the risk of error is very low.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has training documentation that provides detailed instructions on all the information requirements, where to find it on the document and where to register it on the system.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	All materials received are checked against the invoice or the purchase order, based on Standard Operating Procedures.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity's responsible person regularly checks the ASI website to verify the validity and scope of the supplier's ASI Chain of Custody Certification and for any changes that might affect the status of the supplied Chain of Custody Material or Eligible Scrap.
10.4 Error (Reception)	Conformance	The Entity has implemented a procedure to be followed when errors are identified, either on the incoming or outgoing Chain of Custody material. All errors are reported in the Error Documentation Form, providing room for root cause analysis, corrective actions documentation, and follow-up.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has appropriate systems and controls in place to ensure that any claims made by the Entity regarding CoC Material are consistent with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has appropriate systems and controls in place to ensure that any claims made by the Entity regarding CoC Material are consistent with the ASI Claims Guide.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has appropriate systems and controls in place to ensure that any claims made by the Entity regarding CoC Material are consistent with the ASI Claims Guide including training provided to workers.

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	9 August 2021	Initial Certification Audit – Full Certification
1	20 July 2023	Surveillance Audit
2	13 November 2024	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply CoC V2; (Three-month extension to prior certification period approved by ASI)