

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Emirates Global Aluminium PJSC

CERTIFICATE NUMBER

428

ASI STANDARD

CHAIN OF CUSTODY  
STANDARD  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE SERVICES  
UK LTD.

DATE OF ISSUE

9 JANUARY 2025

DATE OF EXPIRY

8 JANUARY 2028

CERTIFIED SINCE

9 JANUARY 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Al' 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](http://www.aluminium-stewardship.org)

CERTIFICATION SCOPE

Smelting of Alumina to produce Aluminium, remelting of Scrap Aluminium and casting at Al Taweelah site in Abu Dhabi and Jebel Ali site in UAE, to produce ASI cast products and ASI liquid alloys. Refining of Bauxite to produce Alumina at Al Taweelah.

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	Emirates Global Aluminium PJSC
ENTITY NAME	Emirates Global Aluminium PJSC
CERTIFICATION SCOPE	All Emirates Global Aluminium PJSC operational sites in the UAE including smelting and casting of aluminium, carbon plants, power generation and associated facilities at Jebel Ali (UAE) and Al Taweelah (UAE) as well as an alumina refinery and EGA headquarters in Al Taweelah (UAE).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Alumina Refining</li><li>Aluminium Smelting</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>23 – 30 September 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>6 December 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the Al Taweelah Alumina Refinery, Al Taweelah and Jebel Ali Smelters.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Alumina Refining</li><li>Aluminium Smelting</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- ☑ 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.
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CERTIFICATION PERIOD 9 January 2025 – 8 January 2028

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DUE DATE 9 January 2026

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CERTIFICATE NUMBER 428

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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.

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## ENTITY OVERVIEW

Emirates Global Aluminium (EGA) was established in 2014 through the merger of Emirates Aluminium and Dubai Aluminium, with history dating back to the 1970s when Dubai Aluminium was founded. Headquartered in the United Arab Emirates (UAE), the Entity is jointly owned by Mubadala Investment Company of Abu Dhabi and Investment Corporation of Dubai. EGA's operations in the UAE (considered 'the Entity') operates two smelters, Al Taweelah in Abu Dhabi and Jebel Ali in Dubai, each equipped with its own anode production facilities, Casthouses, and captive power plants. The Jebel Ali smelter began production in 1979, with eight separate expansions since then and the site currently includes seven potlines and 12 casting stations producing 1.1 million tonnes of product. The Al Taweelah smelter was the largest single-site Aluminium smelter in the world when built and the site currently includes three potlines and nine casting stations producing 1.5 million tonnes of product. The smelters are also connected to the local electrical grid, allowing access to solar energy. Additionally, the Entity operates an Alumina refinery in Abu Dhabi, which was the first in the UAE and only the second in the Middle East and began production in 2019. The facility converts Bauxite into Alumina, with the refinery meeting almost half of the Entity's Alumina requirements, producing approximately 2.48 million tonnes and securing the competitive supply for the Entity.

EGA owns Guinea Alumina Corporation (GAC), a bauxite mine and export facilities in the Republic of Guinea, West Africa. Exports of bauxite ore began in 2019 and produced 14.1 million tonnes in 2023. GAC operates a 690-square kilometre mining concession which is one of the largest greenfield investments in Guinea over the last 40 years. Bauxite from GAC is predominantly supplied by EGA to third-party customers, with some shipped to EGA's Al Taweelah alumina refinery in Abu Dhabi. More recently, EGA completed two major acquisitions in 2024 - 100 per cent of Leichtmetall, a European producer of high-strength recycled Aluminium that operates a plant in Hannover, Germany, and 80 per cent of Spectro Alloys, a leading secondary foundry alloy producer based in Rosemount, Minnesota in the United States. Leichtmetall has a capacity of 30,000 tonnes per annum of Aluminium billets produced using renewable energy with 80% scrap metal input, while Spectro Alloys has a capacity of 110,000 tonnes per annum of Aluminium ingots using advanced sorting and analysis technology to produce a wide variety of alloys with a high proportion of scrap input.

There are currently over 7,000 employees working across all of EGA's facilities.

## 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.

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

	OVERALL
<b>SYSTEMS</b>	High
<b>RISKS</b>	High
<b>PERFORMANCE</b>	Medium
<b>OVERALL</b>	<b>HIGH</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. MANAGEMENT SYSTEM AND RESPONSIBILITIES</b>		
1.1 ASI Membership	Conformance	The Entity has been an ASI Member in the Production and Transformation membership class since February 2017: <a href="https://aluminium-stewardship.org/about-asi/members/Emirates-Global-Aluminium-PJSC">https://aluminium-stewardship.org/about-asi/members/Emirates-Global-Aluminium-PJSC</a>
1.2 CoC Management System	Conformance	The Entity has established a Chain of Custody (CoC) Manual that adequately and appropriately addresses all the applicable requirements of the ASI CoC Standard; more specifically all Facilities within their CoC's Certification Scope that take Custody of CoC Material.
1.3 CoC Management System Monitoring	Conformance	The Entity has ensured that the CoC Manual will continue to be periodically reviewed and updated as the Entity matures in terms of implementation experience. This will include incorporating potential areas of Non-Conformance that may have been highlighted in prior Audits.
1.4 Management Representative	Conformance	The Entity's Sustainability Manager has been appointed with overall responsibility and authority for the Entity's Conformance with all applicable requirements of the ASI CoC Standard.
1.5 Communications and Training	Conformance	The Entity establishes and implements communications and training measures by identifying personnel who require training, developing or sourcing training materials, and setting training requirements and frequency. The Entity holds regular communication and training events to ensure that relevant personnel are aware of, and competent in their responsibilities under the ASI CoC Standard.
1.6 Records Management	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the ASI CoC Standard by systematically documenting compliance activities and retaining these records for a minimum of five years. Records shall be retained in the material management system spreadsheet in electronic format indefinitely.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity is prepared to report on Inputs and Outputs of CoC Material to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity is prepared to report on Inputs and Outputs of CoC Material to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity is prepared to report on Inflows and Outflows of Non-CoC Material to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity is prepared to report on Positive Balance carried over to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity is prepared to report on Positive Balance used to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity is prepared to report on Internal Overdraw drawn down to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity is prepared to report on Intra-Entity Flows to the ASI Secretariat in line with the appropriate reporting ASI template, to be delivered by the 30 June following the end of each calendar year.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable 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 as the Entity does not use Outsourcing Contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not use Outsourcing Contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable 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 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 as the Entity does not use Outsourcing Contractors.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable 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)	Conformance	The Entity is engaged in producing cast products and liquid Aluminium, has a valid ASI membership, currently holds ASI Performance Standard Certification, and has a highly secured refinery, smelting, casthouses, and value-added facilities that ensure ASI Aluminium produced from these Facilities are within their ASI CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity is engaged in producing cast products and liquid Aluminium, has a valid ASI membership, currently holds ASI Performance Standard Certification, and has a highly secured refinery, smelting, casthouses, and value-added facilities that ensure ASI Aluminium produced from these Facilities are within their ASI CoC Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Conformance	As indicated in the Entity's ASI CoC Manual, the Entity sources Alumina from ASI Certified sources in the immediate future, to provide a certified supply chain for the Entity's cast products and liquid Aluminium.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Aluminium in its own Smelter which is within the CoC Certification Scope and does not purchase Aluminium from third parties.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Aluminium in its own Smelter which currently holds ASI Performance Standard certification and does not purchase Aluminium from third parties.
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity is engaged in producing cast products and liquid Aluminium, has a valid ASI membership, currently holds ASI PS Certification, and has highly secured refinery, smelting, Casthouses, and value-added facilities that ensure ASI Aluminium produced from these Facilities are within their ASI CoC Certification Scope.
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity is re-melting Aluminium Scrap from its own Casthouses which are within the CoC Certification Scope. ASI Aluminium produced from the melting of Scrap from this source is thus produced from a Facility within the CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity is re-melting Aluminium Scrap from its own Casthouses which are within the CoC Certification Scope. ASI Aluminium produced from the melting of Scrap from this source is thus produced from a Facility within the Performance Standard Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has given a provision in its Material Accounting System to accept Eligible and non-eligible Scrap in the re-melting process. All non-ASI Scrap, if any, will be accounted for. The system also accounts the Pre-Consumer Scrap returned from its customers as Eligible Scrap since these materials are originally supplied by the Entity and the Scrap suppliers have been subjected to a Due Diligence assessment.

CRITERION	RATING	COMMENT
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity receives Post-Consumer Scrap in the form of used busbars and 'dig-out' from EGA's own facilities. These are subjected to a due diligence assessment. The Material Accounting System developed by the Entity considers Eligible Scrap as that coming from suppliers who have undergone this Due Diligence assessment.
4.2c Eligible Scrap (Dross)	Conformance	The Entity has an established procedure with clear guidelines for treatment and remelting of materials including Dross, ensuring that both 'closed-loop' and Post-Consumer Scrap comply with the sustainability and traceability requirements as set by ASI. The Entity does not buy any Dross from outside the Entity for metal production.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established a system to record the identity, principles and place/s of operation of all direct suppliers of Recyclable Scrap Material. The information is obtained through questionnaire and entered in the Entity's supplier database.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity does not engage in any cash transaction with its direct suppliers of Recyclable Scrap Material. All the payments are made through electronic system. Records of payments were verified. Discussions were held with the sourcing team and all procurement is done through purchase orders which reflect the payment terms.

#### 5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Aluminium Casthouse products in its own Casthouse only, which is within the CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Aluminium Casthouse products in its own Casthouse only, which is within the Entity's Performance Standard Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity produces liquid Aluminium and Casthouse products, has a valid ASI membership, and ensures that ASI Aluminium is produced from their own smelters that are within the scope of their ASI CoC Certification.
5.2 Unique Identification	Conformance	The Entity ensures that there is a reliable and transparent link between the unique identification numbers and the Input Quantities of CoC Material, thereby supporting traceability and compliance with ASI Standards.

#### 6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity effectively adopts and communicates responsible sourcing practices, ensuring that all suppliers are aligned with its sustainability goals and standards. Refer to: Responsible Sourcing Standard <a href="https://www.ega.ae/media/clapfyhb/ega000183-responsible-sourcing-standards-may-2023.pdf">https://www.ega.ae/media/clapfyhb/ega000183-responsible-sourcing-standards-may-2023.pdf</a> and the Responsible Sourcing Policy <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity demonstrates its commitment to responsible sourcing, transparency, and continuous improvement in sustainability performance across its supply chain by integrating rigorous evaluation and audit processes among its suppliers and contractors.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity's core Policy includes commitment to respect Human Rights which is implemented through its Social Management System. The Entity's Due Diligence process incorporates a risk-based approach that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, focusing efforts where the risk of adverse Human Rights impact is most significant. The Entity has not identified to have caused or contributed to adverse Human Rights impacts but has the process to cover this in line with its core Policy and Code of Ethics.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has an adequate Policy and controls for not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRA) either directly or through its supply chain. Enhanced Due Diligence on supply chain includes a CAHRA assessment based on defined criteria.
7.2 Risk Assessment and Mitigation	Conformance	Utilising the Ecovadis platform, the Entity effectively assesses the risks of non-compliance with its Responsible Sourcing Policy, ensuring that it can proactively manage and mitigate potential issues within its supply chain.
7.3 Complaints Resolution Mechanism	Conformance	Through structured components, the Entity effectively resolves grievances and complaints, ensuring that Stakeholders have a clear pathway to voice their concerns and that those concerns are addressed in a timely and responsible manner.
<b>8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM</b>		
8.1 Material Accounting System	Conformance	The Entity has established and is prepared to implement the Chain of Custody Manual with the Material Accounting System to facilitate and integrate all CoC Material transactions and to safeguard the overall integrity of CoC Material as well as the Eligible Scrap Mass Balance within the Certification Scope. Using the tool effectively manages the complexities of tracking and accounting for both CoC and Non-CoC Materials, ensuring compliance with sustainability standards and facilitating responsible sourcing practices.

CRITERION	RATING	COMMENT
8.2 Material Accounting Period	Conformance	The Entity has set the Material Accounting Period to a calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity's relevant offices will implement a mass balance accounting system using the CoC Manual and Material Accounting system to determine the available quantities of CoC Material for input based on the total inflows of CoC and Non-CoC Material by mass.
8.4 Output Quantities of CoC Material	Conformance	The Entity's relevant offices will implement a mass balance accounting system using the CoC Manual and Material Accounting System to determine the available quantities of CoC Material for Input that are proportional to the total Inflows of both CoC and Non-CoC Material, considering their respective masses.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Chain of Custody Manual outlines how the Output will be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity as it does not sell Eligible Scrap nor does it intend to in the future. All Scrap is remelted and reused internally. The only Aluminium products sold are cast products and liquid Aluminium alloy.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity will maintain a Material Accounting System ensuring that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's ASI CoC Manual ensures that the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's ASI CoC Manual ensures that the Internal Overdraw shall not exceed the amount of CoC Material affected by the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's ASI CoC Manual ensures that any Internal Overdraw shall be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's ASI CoC Manual ensures to clearly 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 ASI CoC Manual 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.
<b>9. ISSUING COC DOCUMENTS</b>		
9.1 CoC Document	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits.

CRITERION	RATING	COMMENT
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Dates of Issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Reference Number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Receiving Customer.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Responsible Employee.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include Conformance Statement.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include type of CoC Material.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include mass of CoC Material.

CRITERION	RATING	COMMENT
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's Material Accounting System is in place and can address the Standard's requirements, however at the time of the Audit it did not handle CoC Material. The Entity intends to validate compliance of CoC Material transactions in the coming surveillance audits. All documentation related to CoC Aluminium will include mass of total material.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	The Entity does not intend to include any Sustainability Data or any additional Supplementary Data in the CoC Documentation at present.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	The Entity does not intend to include any Sustainability Data or any additional Supplementary Data in the CoC Documentation at present.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	The Entity does not intend to include any Sustainability Data or any additional Supplementary Data in the CoC Documentation at present.
9.5 Verification of Information	Conformance	The Entity is well equipped to respond to reasonable requests for verification of information in CoC Documents through well-established systems and processes, thereby ensuring accountability and transparency in its operations.
9.6 Error (Shipping)	Conformance	Through the ASI Chain of Custody Manual, the Entity has established a system to ensure that any error that is discovered after CoC Material has been shipped will be documented by both the Entity and the receiving party. Corrective actions to avoid a recurrence will also be implemented and agreed on by the same parties.
<b>10. RECEIVING COC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity effectively verifies that all required information in received CoC Documents is complete and accurate by implementing established processes, thereby ensuring compliance with ASI Standards and maintaining the integrity of its supply chain.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity ensures that the CoC Documents are consistent with the accompanying CoC Material or Eligible Scrap before recording any information in their Material Accounting System, thereby maintaining the integrity of their operations and compliance with ASI Standards.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity regularly monitors the ASI website to verify the validity and scope of its suppliers' ASI CoC Certification and monitor any changes

CRITERION	RATING	COMMENT
		that could affect the status of the CoC Material/Eligible Scrap supplied.
10.4 Error (Reception)	Conformance	Through the ASI Chain of Custody Manual, the Entity has established a system to ensure that any error that is discovered after CoC Material has been received will be documented by both the Entity and the supplying party. To avoid a recurrence, corrective actions will also be implemented and agreed on by the same parties.

## 11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	As the Entity is currently in its initial step towards certification to the ASI CoC Standard and as it intends to make claims and communications about CoC Material outside of CoC Documents, the Entity is currently finalizing all necessary documentation, procedures, and training programs that are compliant to the ASI CoC Claims Guidelines in anticipation of receiving their ASI CoC Certificate.
11.1b Claims and Communications (Verifiable evidence)	Conformance	As the Entity is currently in its initial step towards certification to the ASI CoC Standard and as it intends to make claims and communications about CoC Material outside of CoC Documents, the Entity is currently finalizing all necessary documentation, procedures, and training programs that are compliant to the ASI CoC Claims Guidelines in anticipation of receiving their ASI CoC Certificate.
11.1c Claims and Communications (Employee training)	Conformance	As the Entity is currently in its initial step towards certification to the ASI CoC Standard and as it intends to make claims and communications about CoC Material outside of CoC Documents, the Entity is currently finalizing all necessary documentation, procedures, and training programs that are compliant to the ASI CoC Claims Guidelines in anticipation of receiving their ASI CoC Certificate.

### ASI LIMITATION OF LIABILITY DISCLAIMER

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 January 2025	Initial Certification Audit – Full Certification