

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Speira Rolling and Speira Recycling Services Germany

CERTIFICATE NUMBER

28

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

19 FEBRUARY 2025

DATE OF EXPIRY

18 FEBRUARY 2028

CERTIFIED SINCE

6 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', 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

Rolling mill facilities at Speira Rolling Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), the Speira Corporate Office (Grevenbroich), the joint venture site Alunorf (Germany) and Outsourcing Contractors.

Recycling of Aluminium scrap and production of wrought and foundry alloys according to customer specification at Speira Recycling Services Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by Speira Recycling Services Germany GmbH Headquarters in Grevenbroich (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Speira
ENTITY NAME	Speira and Speira Recycling Services Germany GmbH
CERTIFICATION SCOPE	<p>Rolling mill facilities at Speira Rolling Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), the Speira Corporate Office (Grevenbroich), the joint venture site Alunorf (Germany) and Outsourcing Contractors.</p> <p>Recycling of Aluminium scrap and production of wrought and foundry alloys according to customer specification at Speira Recycling Services Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by Speira Recycling Services Germany GmbH Headquarters in Grevenbroich (Germany).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 October 2018 – 18 February 2019)Surveillance Audit (14 December 2020)Re-Certification Audit and Scope Change (24 – 25 May 2022)Re-Certification Audit and Scope Change (28 October – 5 November 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">Initial Certification Audit (10 October 2018 – 18 February 2019)Surveillance Audit (14 December 2020)Re-Certification Audit and Scope Change (24 – 25 May 2022)Re-Certification Audit and Scope Change (28 October – 5 November 2024)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 October 2018 – 18 February 2019 (Initial Certification Audit)14 December 2020 (Surveillance Audit)24 – 25 May 2022 (Re-Certification Audit and Scope Change)10 January 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 October 2018 – 18 February 2019)</u></p> <p>The Audit Scope covers the Grevenbroich, Hamburg, and Neuss (Germany) sites, as well as the joint venture site Alunorf (Germany). The Audit Scope also includes all Outsourced Contractors that handle the Entity's CoC Material.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Smelting

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

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

Surveillance Audit (14 December 2020)

The Audit Scope covers the Grevenbroich, Hamburg, Neuss (Germany) sites, as well as the joint venture site Alunorf (Germany).

Supply chain activities included in the audit scope:

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

All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

At the time of the audit (December 2020), 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 the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification Audit and Scope Change (24 – 25 May 2022)

The Audit Scope covers Speira headquarters and production sites in Rheinwerk/Neuss, Grevenbroich, Hamburg, and joint venture partner Alunorf. The scope also includes all outsourced contractors.

The ASI Multi-Site sampling approach was undertaken to include the production sites located in Rheinwerk/Neuss and Grevenbroich as well as Speira Headquarters.

Supply chain activities included in the audit scope:

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

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

Re-Certification Audit and Scope Change (28 October – 5 November 2024)

The Audit Scope covered the Speira Corporate Office (Grevenbroich), Speira Recycling Services Grevenbroich and Töging, and the Speira Recycling Services Germany GmbH Headquarters.

The ASI Multi-Site sampling approach was undertaken and the Speira Rolling sites at Hamburg and Rheinwerk/Neuss, the Alunorf joint venture site, and the Speira Recycling Services Germany GmbH site at Deizisau, were not visited as part of the Audit Scope. During the Audit it was identified that the Management Systems for Speira and Speira Recycling Services Germany GmbH were currently not fully aligned, and Speira's rolling mills in Germany and Norway had different Management Systems, which limited the Audit Team obtaining a complete overview of the Entity's systems and procedures.

The 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.
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CERTIFICATION PERIOD 19 February 2025 – 18 February 2028

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 18 February 2028

CERTIFICATE NUMBER 28



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

Speira (the 'Entity') delivers high quality, low carbon products based on rolling and recycling capabilities and consists of Speira rolling mills sites in Germany and Norway and Speira Recycling Services remelting facilities in Germany. The Entity was formed in 2023 through the merger of Speira rolling mills and the former Real Alloy Europe. The production sites include surface treatment lines, annealing lines, hot mills, cold mills, remelting furnaces, casting furnaces and casthouses. The Entity's oldest sites commenced production in 1917. The Entity serves sectors such as automotive, shipping and transport, battery systems, building, beverage cans and packaging. The Entity recycles up to 650,000 tonnes of Aluminium per annum and produces around one million tonnes of advanced rolled products.

The supply chain activities and approximate number of Workers at each of the Entity's sites includes:

- Speira Rolling:
 - Speira Grevenbroich – Post-Casthouse, with 2,000 Workers
 - Hamburg – Aluminium Re-melting/Refining, Casthouses, and Post-Casthouse, with 600 Workers
 - Rheinwerk/Neuss – Aluminium Re-melting/Refining and Casthouses, with 150 Workers
 - Speira Corporate Office – 6,000 Workers.
- Speira Recycling Services Germany GmbH:
 - Deizisau – Aluminium Re-melting/Refining and Casthouses, with 65 Workers
 - Töging – Aluminium Re-melting/Refining and Casthouses, with 180 Workers
 - Speira Recycling Services Germany Grevenbroich – Aluminium Re-melting/Refining and Casthouses, with 165 Workers
 - Speira Recycling Services Germany Headquarters – Aluminium Re-melting/Refining and Casthouses, with 50 Workers.
- Alunorf – Aluminium Re-melting/Refining, Casthouses, and Post-Casthouse, with 2,000 Workers

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
SYSTEMS	Medium
RISKS	High
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member committed to complying with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category and holds ASI Performance Standard Certification. For further information please refer to the ASI website: https://aluminium-stewardship.org/about-asi/members/Speira
1.2 CoC Management System	Conformance	The Entity has established a Management System and a Management System Documentation Procedure for handling ASI Material. The procedure describes the purpose, scope, responsibilities and the general system and workflow which provides governance of the CoC system.
1.3 CoC Management System Monitoring	Conformance	The Entity has established procedures and processes to comply with the ASI Chain of Custody Standard criteria regarding the periodic review of the Management System and associated updates as required. An annual review of the regular management review process has been established.
1.4 Management Representative	Conformance	The Entity has appointed the Head of Sustainability as the responsible person for the ASI Chain of Custody Standard implementation and conformance. Within the Entity, a team assists with this role. The role and responsibilities are defined in writing and are communicated within the Entity.
1.5 Communications and Training	Conformance	The Entity has developed and implemented communications and training measures that ensure relevant personnel are aware of and are competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity's standard operating procedure defines the retention time required by the ASI Chain of Custody Standard.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has implemented an operating procedure to report the Input and Output Quantities of CoC Material to the ASI Secretariat prior to the required date each calendar year. Reports have been submitted for previous years.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has implemented an operating procedure to report on the total Input and Output Quantities of Eligible Scrap to the ASI Secretariat prior to the required date each calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has implemented an operating procedure to report the Input and Output Quantities of Non-CoC Material to the ASI Secretariat prior to the required date each calendar year. Reports have been submitted for previous years.

CRITERION	RATING	COMMENT
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has implemented an operating procedure to report any Positive Balance to the ASI Secretariat prior to the required date each calendar year.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity reports the Positive Balance used to the ASI Secretariat prior to the required date each calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has implemented an operating procedure to report any Internal Overdraw to the ASI Secretariat prior to the required date each calendar year.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has implemented an operating procedure to report any Intra-Entity Flows to the ASI Secretariat prior to the required date each calendar year.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to contractors.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to contractors.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to 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 currently outsource any CoC Material to contractors.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable, as the Entity does not currently outsource any CoC Material to contractors.

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

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

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

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity is engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. The production sites are included in the ASI Chain of Custody Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity is engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. The production sites are included in both the ASI Chain of Custody Standard and Performance Standard Certification Scopes. The Entity has procedures in place to check the ASI Certification status of any externally purchased Recycled Aluminium.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has established procedures and processes to verify Pre-Consumer Scrap as designated CoC Material. These quantities are reflected the Entity's Mass Balance System.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity has established procedures and an Accounting System to govern the qualification of eligible Post-Consumer Scrap. Due Diligence processes are in place for qualifying and follow-up on Scrap suppliers.
4.2c Eligible Scrap (Dross)	Conformance	The Entity has established procedures and processes to verify Dross as designated CoC Material through targeted Due Diligence.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has implemented a process to gather and verify information on Recyclable Scrap suppliers.
4.3b Records Management for Direct Suppliers of	Conformance	The Entity does not accept cash payments for metal and/or recyclable scrap metal purchasing transactions.

CRITERION	RATING	COMMENT
Recyclable Scrap Material (Financial transactions)		
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Recycled Aluminium. These sites are included within the Entity's ASI CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Recycled Aluminium. All sites are ASI Performance Standard and Chain of Custody Standard Certified. The Entity has five production sites: Hamburg, Rheinwerk/Neuss, Deizisau, Grevenbroich and Töging.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has appropriate systems in place to trace incoming material from suppliers and validate that ASI Aluminium is produced only from ASI CoC Certified suppliers.
5.2 Unique Identification	Conformance	The Entity has implemented a Material Accounting System that is designed to ensure all Input and Output of CoC Material is identified with unique identification numbers. These numbers are traceable within the Entity's Enterprise Resource Planning (ERP) system. Solid ASI Aluminium is stamped with a unique batch number and physically marked as CoC Material.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Post-Casthouse Facilities are included in the ASI CoC Standard Certification Scope. The Entity's procurement department reviews ASI Certificates from any suppliers of Post-Casthouse operations.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity's Post-Casthouse Facilities are included in the ASI Performance Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has established a Responsible Sourcing Policy that ensures that it only uses Aluminium from ASI CoC Certified Facilities.
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 established a Supplier Code of Conduct addressing Anti-Corruption. Suppliers must review and sign the Code of Conduct. The Speira Supplier Code of Conduct is available at: https://www.speira.com/downloads/terms-and-conditions-and-policies/
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has established a Sustainable Sourcing Policy and suppliers must review and sign the Speira Supplier Code of Conduct. This Policy contains a responsible sourcing requirement.

CRITERION	RATING	COMMENT
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has established a Supplier Code of Conduct addressing Human Rights Due Diligence. All suppliers must review and sign the Supplier Code of Conduct and Due Diligence is applied before it commences business with the Entity. Speira's Supplier Code of Conduct is available at: https://www.speira.com/downloads/terms-and-conditions-and-policies/
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Minor Non-Conformance	The Entity has established a Supplier Sourcing Policy. All suppliers must sign the Supplier Code of Conduct and Due Diligence is applied before it commences business with the Entity. There is however limited reference to Conflict-Affected and High-Risk Areas (CAHRA) in the Sustainable Sourcing Policy. Speira's Supplier Code of Conduct is available at: https://www.speira.com/downloads/terms-and-conditions-and-policies/
7.2 Risk Assessment and Mitigation	Minor Non-Conformance	The Entity has established a Due Diligence process, led by the procurement department to assess risks of non-compliance with its Supplier Code of Conduct. This includes risk-assessment and a qualification process for all new suppliers, as well as ongoing risk monitoring of its supply chain. Whilst the questionnaire and audit systems are in place there are limited mitigation actions or plans where non-conformances are detected.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established Complaint Mechanisms for concerns raised through different channels, such as the company website or 'Speira SpeakUp' community: https://www.speira.com/feedback-concerns/
8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Minor Non-Conformance	The Entity has established a Material Accounting System to govern and report on the Input Quantity and Output Quantity of CoC Material and Non-CoC Material. However, during the Audit an error was detected in the consolidation sheet and some source evidence was not provided to the auditors at the time.
8.2 Material Accounting Period	Conformance	The Entity's procedure describing their Material Accounting System specifies a Material Accounting Period of one calendar year (12 months).
8.3 Input and Inflow Quantities	Conformance	The Entity has established a Material Accounting System to govern and report on the Input Quantity and Output Quantity of CoC Material and Non-CoC Material.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Material Accounting System to govern and report on the Input Quantity and Output Quantity of CoC Material and Non-CoC Material.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Material Accounting System controls the Output Quantity designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's Material Accounting System calculates the Output Quantity from internal Eligible Pre-Consumer Scrap in line with the ASI requirement.

CRITERION	RATING	COMMENT
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure that Outputs do not exceed Inputs.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established procedures and systems to control material accounting and ensure that Internal Overdraw does not exceed 20%.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure that an Internal Overdraw does not exceed the amount of CoC Material when affected by a Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure an Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure a Positive Balance is carried over to the subsequent Material Accounting Period.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure the Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down.

9. ISSUING CoC DOCUMENTS

9.1 CoC Document	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity will include CoC information in the delivery notes.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC documents includes a reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the identity, address and CoC Certification number of the issuer.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the identity, address and CoC Certification number of the receiving Entity.

CRITERION	RATING	COMMENT
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the name of the responsible employee.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes a statement confirming that 'The information provided in the CoC Document is in conformance with the ASI CoC Standard.'
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the type of CoC Material in each shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the mass of CoC Material in each shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Document includes the mass of total material in each shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity ensures that if, and as requested by a customer, relevant sustainability information will be included in the CoC Document. Carbon footprint information is provided upon customer request.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity ensures that if, and as requested by a customer, relevant sustainability information will be included in the CoC Document.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity ensures that if, and as requested by a customer, relevant sustainability information will be included in the CoC Document.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity will provide the ASI Certification status of the Post-Casthouse to customers, as appropriate.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity will provide any Supplementary Information to customers, as appropriate.
9.5 Verification of Information	Conformance	The Entity will respond to requests for the verification of information in issued CoC Documents, which is detailed in the ASI management procedure. The Entity's ASI Manager is in charge to respond to requests related to CoC Documents.
9.6 Error (Shipping)	Conformance	The Entity has defined in its ASI management procedure the method for the management of errors regarding CoC Material shipments.

CRITERION	RATING	COMMENT
10. RECEIVING CoC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has developed a Management System procedure and has established routines to regularly check and verify received CoC Documents.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has developed a Management System procedure and has established routines to regularly check the consistency of the CoC Documents before recording information in the Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has developed a Management System procedure and established routines to regularly check the ASI website to verify the validity and scope of supplier's ASI Chain of Custody Certification.
10.4 Error (Reception)	Conformance	The Entity has developed an error management procedure to record and manage situations when an error has occurred.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity ensures that any claims made about CoC Material outside of CoC Documents are consistent with the ASI Claims Guide. At the time of the Audit, there were no such claims.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity ensures that any claims made about CoC Material outside of CoC Documents are consistent with the ASI Claims Guide and supported with verifiable evidence. At the time of the Audit, there were no such claims.
11.1c Claims and Communications (Employee training)	Conformance	The Entity ensures that training on the ASI Claims Guide will be given to any communications and sustainability employees as required. At the time of the Audit, there were no such claims.

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	6 May 2019	Initial Certification Audit – Full Certification
1	14 September 2021	Surveillance Audit; Minor update to the layout of the Audit Scope description for the Initial Certification Audit.
2	20 December 2021	Transfer of Certification to Speira from Hydro Aluminium Rolled Products – Provisional Certification.
3	27 October 2022	Re-Certification Audit and Scope Change – Full Certification. Scope Change to include Speira Headquarters.

Re-Certification Audit and Scope Change – Full Certification

Scope Change to apply ASI Chain of Custody V2; Scope Change to add Speira Recycling Services Germany GmbH, including Speira Recycling Services Germany (Grevenbroich) (previously 'Grevenbroich'), Deizisau, Töging and Speira Recycling Services HQ as a transfer of Certificate 221; Scope Change to remove the supply chain activity 'Aluminium Smelting' associated with ceasing all Primary Aluminium smelting operations at the Rheinwerk/Neuss plant.

Correction to Rev 3 to include the Rating and Comment for Criterion 2.5

(Conformance Rating, 'The Entity has developed an error management procedure.

No errors have been identified up to date.');

Correction to the Audit Type associated with Rev 3 to include a 'Re-Certification Audit and Scope Change';

Update to Rev 3 Document Control notes.
