

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Aluminerie Alouette Inc.

CERTIFICATE NUMBER

219

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

DATE OF ISSUE

1 JULY 2025

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

30 JUNE 2028

ASI ACCREDITED
AUDITING FIRM

BNQ

CERTIFIED SINCE

1 SEPTEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.' followed by a long horizontal line.

CERTIFICATION SCOPE

Aluminium smelter, Casthouse and operational activities conducted at the Alouette facility in Sept-Îles (QC), Canada.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Aluminerie Alouette
ENTITY NAME	Aluminerie Alouette Inc.
CERTIFICATION SCOPE	Aluminium smelter, Casthouse and operational activities conducted at the Alouette facility in Sept-Îles (QC), Canada.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (20 – 21 October 2021)Re-Certification Audit and Scope Change (21 – 24 October 2024)
AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none">20 – 21 October 2021 (Initial Certification Audit)21 – 24 October 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">14 July 2022 (Initial Certification Audit)6 June 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 – 21 October 2021)</u></p> <p>The Audit Scope for Aluminerie Alouette Inc. includes operations, maintenance and services required for the production of Primary Aluminium in the facility located in Canada.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria from the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (21 – 24 October 2024)</u></p> <p>The Audit Scope for Aluminerie Alouette Inc. includes operations, maintenance and services required for the production of Primary Aluminium in the facility located in Canada.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria from the ASI Chain of Custody Standard were included in the Audit Scope.</p>
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

1 July 2025 - 30 June 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DUE DATE

30 December 2025

CERTIFICATE NUMBER

219



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

Inaugurated in 1992, Aluminerie Alouette Inc. (the 'Entity') is an independent Aluminium producer. With over 900 employees and an annual production capacity of nearly 630,000 tonnes of Primary Aluminium, the Entity is the largest private employer in Sept-Îles (province of Quebec in Canada) and the largest Aluminium Smelter in America. The Entity is surrounded by the Sept-Îles Bay and the St-Lawrence River, approximately six kilometres southwest of the municipality. The Entity is located in an industrial area.

The Entity's ownership consists of the following five shareholders: AMAG Austria Metall AG (Austria, 20%), Hydro Aluminium (Norway, 20%), Qualium (Canada, 6.67%), Marubeni Metals & Minerals (Japan, 13.33%) and Rio Tinto (Canada, 40%).

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	Low
RISKS	Low
PERFORMANCE	Low
OVERALL	LOW

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Production and Transformation member and is committed to ASI's membership obligations. Aluminerie Alouette Inc. (AAI: the Entity) has appeared in the Production and Transformation Member Class on the ASI website since May 2019: https://aluminium-stewardship.org/about-asi/asi-members/aluminerie-alouette
1.2 CoC Management System	Minor Non-Conformance	<p>The Entity has implemented a Global Integrated Management System and accompanying procedures that address the requirements of the ASI Chain of Custody (CoC) Standard for managing CoC Material. The Entity has provided adequate resources to maintain its Management System and Material Accounting System.</p> <p>However, the Material Accounting System did not systematically provide all the required quality control processes to enable the early detection of discrepancies in CoC data in the 2023 Entity's CoC Report to the ASI Secretariat.</p> <p>In response, the Entity has implemented adequate corrective actions and submitted a revised 2023 CoC Report to the ASI Secretariat. The involved quantities adjustment from this Entity shows discrepancies but all certificates (CoC Documents) issued by the Entity for CoC Aluminium were in conformance with Certified Input Quantities of CoC Alumina and did not Materially affect the 2023 global scale of ASI declared Certified material by the ASI Secretariat.</p>
1.3 CoC Management System Monitoring	Minor Non-Conformance	<p>The Entity ensures that the Management System is periodically reviewed and updated. Evidence provided during the Audit confirmed that the greater integrated Management System is regularly reviewed. The management structure is implemented and upgraded as a part of continuous improvement and encourages staff to be involved in the greater integrated Management System improvements, revisions and activities.</p> <p>However, there was no documented evidence supporting the demonstration that the CoC component of the greater Integrated Management System has been systematically reviewed and updated to address potential areas of Non-Conformance identified at the initial CoC Certification Audit.</p>
1.4 Management Representative	Conformance	The Entity has nominated Management Representatives having overall responsibilities 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 developed and implemented communications and training measures that make relevant personnel aware of their responsibilities under the ASI Chain of Custody Standard. The Entity has developed and implemented Policies, systems, procedures and processes that meet the communications and training requirements.
1.6 Records Management	Conformance	The Entity maintains 'up-to-date' records that address applicable requirements of the ASI Chain of Custody Standard. The Entity has developed standard operating procedures that define the retention time and systems use.

CRITERION	RATING	COMMENT
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Minor Non-Conformance	<p>The Entity's operating procedure specifies that it will report the Input and Output Quantities of CoC material to the ASI Secretariat by June 30th after the end of each calendar year (January to December). The Entity's first CoC Report was prepared for 2023 and submitted to the ASI Secretariat.</p> <p>However, the Entity has overestimated the Inputs and Outputs Quantities of CoC Material in the initial 2023 CoC Report. Despite this, the Outputs of CoC Material did not proportionally exceed the Inputs of CoC Material.</p> <p>The Entity has implemented adequate corrective actions and submitted a revised 2023 CoC Report to the ASI Secretariat. The adjustment of involved quantities by the Entity did not Materially affect the 2023 global scale of ASI declared Certified material by the ASI Secretariat.</p>
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity, as it does not utilise Eligible Scrap.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Minor Non-Conformance	<p>The Entity's operating procedure specifies that it will report the Input and Output Quantities of CoC material to the ASI Secretariat by June 30th after the end of each calendar year (January to December). The Entity's first CoC Report was prepared for 2023 and submitted to the ASI Secretariat.</p> <p>However, the Inflows and the Outflows of Non-CoC Material were underestimated in the initial 2023 CoC Report. The Entity has implemented adequate corrective actions and submitted a revised 2023 CoC Report to the ASI Secretariat.</p>
1.7d Reporting to ASI (Positive Balance carried over)	Minor Non-Conformance	<p>The Entity's operating procedure specifies that it will report the Input and Output Quantities of CoC Material to the ASI Secretariat by June 30th after the end of each calendar year (January to December). The Entity's first CoC Report was prepared for 2023 and submitted to the ASI Secretariat.</p> <p>However, the Positive Balance carried over from 2023 to 2024 was overestimated in the initial 2023 CoC Report. The Entity has implemented adequate corrective actions and submitted a revised 2023 CoC Report to the ASI Secretariat.</p>
1.7e Reporting to ASI (Positive Balance used)	Conformance	<p>The Entity's operating procedure specifies that it will report the Input and Output Quantities of CoC Material to the ASI Secretariat by June 30th after the end of each calendar year (January to December).</p> <p>If the Positive Balance is used by the Entity, it is reported.</p>
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	<p>The Entity's operating procedure specifies that it reports the Input and Output Quantities of CoC Material to the ASI Secretariat by June 30th after the end of each calendar year (January to December).</p> <p>The Internal Overdraw was not drawn down by the Entity in 2023 or 2024, as reported to the ASI Secretariat.</p>
1.7g Reporting to ASI (Intra-Entity Flows)	Minor Non-Conformance	The Entity's operating procedure specifies it reports the Input and Output Quantities of CoC Material to the ASI Secretariat by June 30 th after the end of each calendar year (January to December).

CRITERION	RATING	COMMENT
		The Entity only produces one type of CoC Material - low profile sows. As the Entity has only one type of CoC Material, Intra-Entity Flows of liquid Aluminium from the reduction plant to the Casthouse from the Entity's Aluminium Smelter should not have been reported in the initial 2023 CoC Report. The Entity has implemented adequate corrective actions and submitted a revised 2023 CoC Report to the ASI Secretariat.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, there are no outsourcing activities included within the Certification Scope.
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.
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.

CRITERION	RATING	COMMENT
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)	Conformance	The Entity is a single site engaged in Aluminium Smelting. Aluminium Smelting activities are ASI Performance Standard Certified and are included in the Entity's CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity's Aluminium Smelter is ASI Performance Standard Certified and is included in the Entity's CoC Certification Scope. The Entity's Performance Standard Certificate is available at: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity's owners (shareholders) via the Alumina Committee are responsible for Alumina sourcing from ASI CoC Certified Entities. Shareholders of the Entity own the majority of the supply. Otherwise, Alumina is procured from other ASI CoC Certified producers.
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Casthouse and Aluminium Smelter are located on the same site and produce Casthouse products (sows) from Primary Aluminium, with both included within the Performance and CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse and Aluminium Smelter are located on the same site and produce Casthouse Products (sows) from Primary Aluminium, with both included within the Performance and CoC

CRITERION	RATING	COMMENT
		Certification Scope. The Entity's Performance Standard Certificate is available at: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	The Entity does not directly source ASI Aluminium from ASI CoC Certified Entities or Traders. All Aluminium supplies to the Casthouse are produced on-site at the Entity's Aluminium smelter.
5.2 Unique Identification	Conformance	The Entity has established a Material Accounting System that allows for the traceability of material and provides full traceability through Product identification (i.e., each sow has a unique identification number) on all shipments and deliveries from the Casthouse.
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.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	<p>The Entity is ASI Performance Standard Certified and has demonstrated Conformance on related Anti-Corruption requirements: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf</p> <p>The Entity's owners (shareholders) via the Alumina Committee are responsible for sourcing Alumina for Smelter operations. The owners follow internal guidelines to ensure that responsible sourcing aspects are integrated into Alumina sourcing activities. Some portions of the Alumina supply received were sourced from ASI CoC Certified primary producers in 2023 and 2024.</p> <p>The Committee is also responsible for the Due Diligence process for all Non-Coc Alumina supplies.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity is ASI Performance Standard Certified and has demonstrated Conformance on related responsible sourcing requirements: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf</p> <p>The Entity's owners (shareholders) via the Alumina Committee are responsible for sourcing Alumina for Smelter operations. The owners adhere to internal guidelines to ensure that responsible sourcing aspects are integrated into Alumina sourcing activities. Some portions</p>

CRITERION	RATING	COMMENT
		<p>of the Alumina supply received were sourced from ASI CoC Certified primary producers in 2023 and 2024.</p> <p>The Committee is also responsible for the Due Diligence process for all Non-Coc Alumina supplies.</p>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity is ASI Performance Standard Certified and has demonstrated Conformance to related Human Rights Due Diligence requirements: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf</p> <p>The Entity's owners (shareholders) via the Alumina Committee are responsible for sourcing Alumina for Smelter operations. The owners follow internal guidelines to ensure that responsible sourcing aspects are integrated into Alumina sourcing activities. Some portions of the Alumina supply received were sourced from ASI CoC Certified primary producers in 2023 and 2024.</p> <p>The Committee is also responsible for the Due Diligence process for all Non-Coc Alumina supplies.</p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity is ASI Performance Standard Certified and has demonstrated Conformance to related Conflict-Affected and High-Risk Areas (CAHRAs) requirements: https://aluminium-stewardship.org/wp-content/uploads/2024/01/ASI-Audit-Report-Aluminerie-Alouette-Certificate-85-PS-Rev-3.pdf</p> <p>The Entity's owners (shareholders) via the Alumina Committee are responsible for sourcing Alumina for Smelter operations. The owners follow internal guidelines to ensure that responsible sourcing aspects are integrated into Alumina sourcing activities. Some of the Alumina sourced were from ASI CoC Certified primary producers in 2023 and 2024.</p> <p>The Entity's shareholders own the majority of the supply. Otherwise, Alumina is procured from other ASI CoC Certified producers. The Committee is also responsible for the Due Diligence process for all Non-CoC Alumina supplies.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity assesses and mitigates risk associated with the supply of Alumina with its owners (shareholders) through the Alumina Committee. The shareholders themselves own the majority of the supply. Otherwise, Alumina is procured from other ASI CoC Certified producers. The Committee is also responsible for the Due Diligence process for all Non-CoC Alumina supplies.</p> <p>The Entity's shareholders adhere to an implemented ASI CoC Certified Responsible Sourcing Policy and a Due Diligence Process for Non-Coc Material supplies.</p>
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has established complaints mechanisms and makes it possible to raise concerns through different channels. The two major mechanisms are available at: (https://www.alouette.com/en/our-commitment/governance/whistleblower-line) and via email (communications@alouette.qc.ca).</p> <p>An external firm manages any anonymous complaints received which are then forwarded to the Entity's senior management team.</p>

CRITERION	RATING	COMMENT
8. MATERIAL ACCOUNTING SYSTEM: CoC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Minor Non-Conformance	<p>The Entity has established a Material Accounting System (based on the SAP system) to govern and report on Inputs and Outputs of CoC Material, Inflows and Outflows of Non-CoC Material, Positive Balance of CoC Material, and Input and Output percentages of CoC Material.</p> <p>However, the Material Accounting System did not systematically safeguard the integrity of CoC Material Mass Balance for 2023. The Inputs and Outputs of CoC Material, the Inflows and Outflows of Non-CoC Material and the Positive Balance of CoC Material carried over from 2023 to 2024 were not accurately estimated. Consequently, neither the Input nor Output percentages of CoC Material were accurate.</p>
8.2 Material Accounting Period	Conformance	The Entity has defined a Material Accounting Period of 12 months accounting period from January to December.
8.3 Input and Inflow Quantities	Minor Non-Conformance	<p>The Entity has a Material Accounting System (based on the SAP system) in place to govern and report on Inputs and Outputs of CoC Material, Inflows and Outflows of Non-CoC Material, Positive Balance of CoC Material, Input and Output percentages of CoC Material.</p> <p>However, the Inputs of CoC Material and the Inflows of Non-CoC Material were not all accurately estimated, nor were the Input percentages.</p> <p>Consequently, the Material Accounting System did not record the accurate Inputs and Inflow quantities for 2023.</p>
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Material Accounting System (based on the SAP system) to manage and report on Input/Output Quantities of ASI-CoC Material. The Mass Balance System uses a basic approach where the Input Percentage is either 0% or 100% of Certified content for each received Alumina shipment. One hundred percent of the Certified content of received shipments is compiled by mass in a specific matrix and the zero percent Certified content received shipments are compiled by mass in another specific matrix. The ASI Certified status is attributed to the Certified Outputs from the 100% Certified content matrix.
8.5 Indivisibility of CoC Material	Conformance	The Entity uses the following approach: 0 % and 100 % of Certified content received shipments are compiled by mass in two different material matrices within the Material Accounting System. This accounting method facilitates the allocation of ASI CoC Aluminium attributes. The Entity's approach ensures that it sells only 100% Certified content when the concerned Aluminium sold is Outputs of CoC Material. There is no dilution or reduction of the Certified content for any official Certified Output. The CoC Material remains indivisible.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity as Eligible Scrap is not included in the Certification Scope.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has implemented a Material Accounting System, which includes internal control mechanisms and a conversion rate to ensure that Outputs of Certified Aluminium does not proportionally exceed Inputs of Certified Alumina.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established procedures and systems to ensure that Internal Overdraws, if any, do not exceed 20% for a given Material Accounting Period (a calendar year).
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has implemented a Material Accounting System and internal control mechanisms to ensure that Internal Overdraws, if any, do not exceed the amount of ASI-CoC material affected by a Force Majeure situation for a given Material Accounting Period (a calendar year).
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has implemented a Material Accounting System and internal control mechanisms to ensure that the Internal Overdraw, if any, will be made up within the subsequent Material Accounting Period (the subsequent calendar year).
8.9a Positive Balance (Carry over)	Conformance	The Entity has implemented a Material Accounting System and internal control mechanisms to ensure that a Positive Balance is carried over to the subsequent Material Accounting Period and is specifically identified to avoid any confusion with the current reporting period new Inputs of CoC Material.
8.9b Positive Balance (Expiry)	Conformance	The Entity has implemented a Material Accounting System and internal control mechanisms to ensure that any Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down during that specific period.
9. ISSUING CoC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity's CoC process addresses the appropriate documentation of shipment or transfer of CoC Material. CoC Documents are prepared from standard templates.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes a Date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes a Reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes details on the Issuing Entity, namely, its identity, address and CoC Certificate Number (i.e. 219.)
9.2d CoC Document Content (Receiving customer)	Minor Non-Conformance	<p>The Entity's CoC process addresses the appropriate documentation of shipment or transfer of material. Documents are prepared from standard templates.</p> <p>However, the CoC Certification number of any ASI CoC Certified customers does not systematically appear on CoC Documents (manifests) of Certified shipments of CoC Material.</p>

CRITERION	RATING	COMMENT
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template which is shipped with ASI CoC Material and includes details of the Responsible employee.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes a statement of conformance.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes the type of CoC Material.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material which includes the mass of CoC Material.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity has implemented an 'ASI CoC Expedition Document' template, which is shipped with ASI CoC Material and includes the mass of total Material.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity as it does not wish to include Sustainability Data in their CoC Documents.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable to the Entity as it does not wish to include Sustainability Data in their CoC Documents.
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	This Criterion is not applicable to the Entity as it does not wish to include Supplementary Information in their CoC Documents.
9.5 Verification of Information	Conformance	The Entity has established a CoC process to respond to client requests on information presented in CoC Documents and manages the communications with customers with the support of the Alumina Committee.
9.6 Error (Shipping)	Conformance	The Entity has established a corrective action management procedure and CoC process which has a provision to manage, document and correct shipping errors (if any) in agreement with the receiving party.

10. RECEIVING COC DOCUMENTS

CRITERION	RATING	COMMENT
10.1 Verification of CoC Documents	Conformance	The Entity's Alumina Committee manages the received or planned Alumina supply. The Entity has established a Management System procedure to regularly check the consistency of the CoC Documents before recording information in the Material Accounting System (SAP). A sample of received CoC Documents was verified against the applicable requirements.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established a Management System procedure to regularly check the consistency of the received CoC Documents with the accompanying CoC Material before recording the corresponding information in the Material Accounting System (SAP).
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has implemented a Management System procedure to regularly check the consistency of the received documents before recording information in the Material Accounting System (SAP). These verifications include a routine check of the ASI website to verify the validity and scope of any supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material.
10.4 Error (Reception)	Conformance	The Entity has established a CoC process including a corrective action management procedure to manage, document and correct received shipping errors (if any) in agreement with the supplying party.

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	Claims made by the Entity beyond the formal information typically presented in CoC Documents meet applicable requirements of the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has maintained verified evidence such as emails from the ASI Secretariat to support that it has made claims consistent with the ASI Claims Guide.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has developed a claims and communication training guide based on the principles and applicable requirements of the ASI Claims Guide.

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	1 September 2022	Initial Certification Audit – Full Certification
1	1 July 2025	Re-Certification Audit and Scope Change to apply the ASI Chain of Custody Standard V2; 'Correction to the comment for Criterion 8.8 (V2) (equivalent to 8.6 in V3) as the Criterion is within the Entity's Certification Scope.
