

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# ALUDIUM FRANCE SAS

CERTIFICATE  
NUMBER

306

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

21 JULY 2023

DATE OF EXPIRY

20 JULY 2026

CERTIFIED SINCE

21 JULY 2023

AUTHORISED BY

A stylized white signature on a dark grey background, consisting of a large 'A' followed by a long horizontal line.

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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

The Aludium Castelsarrasin plant (France),  
including semi-fabrication (production of coils in  
cold rolling mill).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| MEMBER NAME             | Aludium Premium Aluminium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| ENTITY NAME             | Aludium France SAS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| CERTIFICATION SCOPE     | The Aludium Castelsarrasin plant (France), including semi-fabrication (production of coils in cold rolling mill).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ASI STANDARD            | <ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Initial Certification Audit (10 – 11 May 2023)</li><li>• Surveillance Audit (25 – 26 June 2025)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| AUDIT DATE              | <ul style="list-style-type: none"><li>• 10 – 11 May 2023 (Initial Certification Audit)</li><li>• 25 – 26 June 2025 (Surveillance Audit)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>• 11 July 2023 (Initial Certification Audit)</li><li>• 5 September 2025 (Surveillance Audit)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (10 – 11 May 2023)</u></p> <p>The Audit Scope covers the Aludium Castelsarrasin plant (France) and includes the raw material supplies and operations of etching, rolling mills and slitting.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p>All applicable criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (25 – 26 June 2025)</u></p> <p>The Audit Scope covers the Aludium Castelsarrasin plant (France) and includes the raw material supplies and operations of etching, rolling mills and slitting.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> |

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                               | Relevant Criteria in the ASI Chain of Custody Standard that were identified as risk areas were included in the Audit Scope.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| AUDIT OUTCOME                 | <ul style="list-style-type: none"> <li>• Certification</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 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> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul> |
| CERTIFICATION PERIOD          | 21 July 2023 – 20 July 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| NEXT AUDIT TYPE               | Re-Certification Audit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| NEXT AUDIT DUE DATE           | 20 July 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| CERTIFICATION NUMBER          | 306                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

## SUMMARY OF FINDINGS

| CRITERION                                  | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 MANAGEMENT SYSTEM AND RESPONSIBILITIES   |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1.1 ASI membership                         | Conformance | The Entity has been a member of ASI in the 'Production and Transformation' membership category since December 2021, verified on the ASI website.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1.2 Management system                      | Conformance | The Entity has developed and implemented the 'ASI 001 Chain of Custody Procedure France' ('ASI 001') for the application of the ASI Chain of Custody (CoC) Standard. The Entity's overall ASI Management System is based on existing robust Management Systems, such as for ISO standards certification.                                                                                                                                                                                                                                                         |
| 1.3 Management system reviews              | Conformance | The Entity has outlined in its ASI Procedure the requirement to review the procedure every three years. This is also part of the requirements for the Entity's ISO certified Management Systems. The Entity uses a highly detailed management review tracker to monitor its procedure updates, including ASI-related aspects.                                                                                                                                                                                                                                    |
| 1.4 Management representative              | Conformance | Responsibilities are outlined in the Entity's ASI Procedure and job descriptions have been updated.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1.5 Training                               | Conformance | The Entity's management team and managers of various departments have adequate awareness of the ASI procedure. New team members have been trained since the initial Certification.<br>The ASI 001 procedure states that ASI and CoC Certification managers, as well as other team members that are directly involved in planning, implementing and controlling of ASI-related procedures must be trained. Training records signed by trainees were presented during the Audit. Interviews and a review of training materials and records confirmed this finding. |
| 1.6 Record keeping                         | Conformance | The Entity has confirmed that the retention period for ASI-related documents is at least five years, as outlined in the ASI Procedure. The Entity has a robust process for document management as part of its ISO certified Management Systems.                                                                                                                                                                                                                                                                                                                  |
| 1.7a Reporting to ASI (Inputs and Outputs) | Conformance | The Entity has integrated in its ASI Procedure the necessary instructions for reporting to the ASI Secretariat. According to the procedure, the Entity must send the final report (in English) to the ASI Secretariat no later than 30 June of each year by the responsible person. The report must include the Input                                                                                                                                                                                                                                            |

| CRITERION                                                                       | RATING         | COMMENT                                                                                                                                                                                       |
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|                                                                                 |                | and Output Quantities of CoC Material/s to/from the Certified Entity over the calendar year.<br>The Entity has confirmed its systems can provide the required metrics to the ASI Secretariat. |
| 1.7b Reporting to ASI (Input Percentage)                                        | Conformance    | The Entity has integrated in its ASI Procedure the necessary instructions for reporting to the ASI Secretariat including the Input Percentage.                                                |
| 1.7c Reporting to ASI (Positive Balance)                                        | Conformance    | The Entity has integrated in its ASI Procedure the necessary instructions for reporting to the ASI Secretariat including the Positive Balance, if any.                                        |
| 1.7d Reporting to ASI (Internal Overdraw)                                       | Conformance    | The Entity has integrated in its ASI Procedure the necessary instructions for reporting to the ASI Secretariat including the Internal Overdraw, if any.                                       |
| 1.7e Reporting to ASI (Eligible Scrap)                                          | Conformance    | The Entity has integrated in its ASI Procedure the necessary instructions for reporting to the ASI Secretariat including Eligible Scrap, if any.                                              |
| 1.7f Reporting to ASI (ASI Credits from Casthouses)                             | Not Applicable | This Criterion is not applicable to the Entity, as the Entity does not intend to use ASI Credits.                                                                                             |
| 1.7g Reporting to ASI (ASI Credits purchased)                                   | Not Applicable | This Criterion is not applicable to the Entity, as the Entity does not intend to use ASI Credits.                                                                                             |
| 2 OUTSOURCING CONTRACTORS                                                       |                |                                                                                                                                                                                               |
| 2.1 Outsourcing Contractors in CoC Certification Scope                          | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.2a Control of CoC Material                                                    | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.2b No further outsourcing                                                     | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.2c Risk assessment                                                            | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.3 Output Quantity                                                             | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.4 Verification and record-keeping                                             | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 2.5 Error management                                                            | Not Applicable | This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.                                                                                               |
| 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL |                |                                                                                                                                                                                               |
| 3.1a CoC Certification Scope – Bauxite Mining                                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                         |

| CRITERION                                                              | RATING         | COMMENT                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.1b ASI Performance Standard – Bauxite Mining                         | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 3.2a CoC Certification Scope – Alumina Refining                        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 3.2b ASI Performance Standard – Alumina Refining                       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 3.3a CoC Certification Scope – Aluminium Smelting                      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 3.3b ASI Performance Standard – Aluminium Smelting                     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL |                |                                                                                                                                                                                                                                                                                                             |
| 4.1a CoC Certification Scope – Aluminium Re-Melting/Refining           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4.1b ASI Performance Standard – Aluminium Re-Melting/Refining          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4.2a Pre-Consumer Scrap and Dross                                      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4.2b Post-Consumer Scrap                                               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4.3a Supplier records                                                  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 4.3b Cash payments                                                     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM                               |                |                                                                                                                                                                                                                                                                                                             |
| 5.1a CoC Certification Scope – Casthouses                              | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 5.1b ASI Performance Standard – Casthouses                             | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 5.2 Casthouse Products                                                 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                       |
| 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM                           |                |                                                                                                                                                                                                                                                                                                             |
| 6.1a CoC Certification Scope – Post-Casthouse                          | Conformance    | The Entity exclusively sources Aluminium from two Certified Entities within the Aludium Group (in Spain), that are certified to the ASI Performance Standard and ASI Chain of Custody Standard.<br>The Entity produces ASI Aluminium only from the Castelsarrasin plant within the CoC Certification Scope. |

| CRITERION                                                                | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 6.1b ASI Performance Standard – Post-Casthouse                           | Conformance | The Entity has been a member of ASI in the 'Production and Transformation' membership category since December 2021 and is certified to the ASI Performance Standard.                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6.1c Sourcing ASI Aluminium                                              | Conformance | The Entity exclusively sources Aluminium from two Certified Entities within the Aludium Group (in Spain), that are certified to the ASI Performance Standard and ASI Chain of Custody Standard. The Group has established a single Material Accounting System for all three Entities, enabling a rigorous and centralised collection of the information required for traceability of CoC Material.                                                                                                                                                                          |
| 7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL         |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7.1a Responsible sourcing policy (anti-corruption)                       | Conformance | The Entity's Code of Conduct covers anti-Corruption. The Due Diligence assessment of suppliers of Non-CoC Material is managed at Group-level in the Spanish plants where the Metal Purchasing functions are located.                                                                                                                                                                                                                                                                                                                                                        |
| 7.1b Responsible sourcing policy (responsible sourcing)                  | Conformance | Responsible sourcing and the Due Diligence assessment of suppliers of Non-CoC Material is managed at Group-level in the Spanish plants where the Metal Purchasing functions are located. The Entity also requires its suppliers to sign standard Terms and Conditions which contain sections on Business Ethics, Respect for Human Rights, the Environment and Health and Safety. The supplier evaluation questionnaire was reviewed during the Audit and it contained all sustainability aspects outlined in the Terms and Conditions.                                     |
| 7.1c Responsible sourcing policy (human rights due diligence)            | Conformance | The Due Diligence assessment of suppliers of Non-CoC Material is managed at Group-level in the Spanish plants where the Metal Purchasing functions are located. The Group has a Human Rights Compliance Validation Procedure based on the United Nations Guiding Principles on Business and Human Rights. There was awareness of the policy and procedure amongst the management team. Human Rights Due Diligence is also considered in the Group's procedure for mergers and acquisitions. The Aludium Code of Conduct also states the commitment to respect Human Rights. |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance | The Due Diligence assessment of suppliers of Non-CoC Material is managed at Group-level in the Spanish plants where the Metal Purchasing functions are located.                                                                                                                                                                                                                                                                                                                                                                                                             |

| CRITERION                                             | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                                       |             | The Aludium Code of Conduct states the commitment to respect Human Rights and addresses Conflict-Affected and High-Risk Areas. The Code explicitly prohibits Child Labour, respects the freedom of employees to join legally authorised associations; and condemns Forced Labour, physical abuse and any other form of abusive behaviour towards employees and other organisations that the Entity does business with.                                                                                                                                                                                                                                                                 |
| 7.2 Risk assessment                                   | Conformance | <p>The Due Diligence assessment of suppliers of Non-CoC Material is managed at Group-level in the Spanish plants where the Metal Purchasing functions are located.</p> <p>The Group has implemented a Human Rights Compliance Validation Procedure, which aims to detect the risks associated with Human Rights violations caused by its direct and indirect activities. The procedure was designed based on the Human Rights Compliance Assessment (HRCA) methodology created by the Danish Council on Human Rights.</p>                                                                                                                                                              |
| 7.3 Complaints mechanism                              | Conformance | <p>The Entity has implemented multiple mechanisms to address complaints. The Entity has a confidential Employee Reporting Channel aimed at detecting the risks associated with Human Rights violations caused by its direct and indirect activities. Contact forms are available on the Aludium website.</p> <p>The traceability and management of customer and/or supplier complaints are integrated into the Group's Enterprise Risk Planning (ERP) System.</p> <p>The Entity also meets the requirement of addressing Stakeholder complaints as part of the Integrated Management System it operates and which is certified to ISO 9001 and ISO 14001, ISO 45001 and ISO 50001.</p> |
| 8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 8.1 Material Accounting System                        | Conformance | The Entity has established a single Material Accounting System for all three sites, including the Entity. This is fully integrated into the Group's ERP system. This integration allows for rigorous and centralised collection of the information required for CoC Material traceability, such as recording the Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The parameters of this system are outlined in the Entity's ASI Procedure and an extensive demonstration of the ERP system was carried out during the Audit to evidence the process.                                                                                                 |

| CRITERION                                            | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.2a Post-Consumer Scrap                             | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                    |
| 8.2b Pre-Consumer Scrap (total)                      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                    |
| 8.2c Pre-Consumer Scrap (Eligible Scrap)             | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                    |
| 8.3 Material Accounting Period                       | Conformance    | A Material Accounting Period of twelve months has been established and specified in the Entity's ASI Procedure.                                                                                                                                                                                                                                                                                                                          |
| 8.4 Input Percentage                                 | Conformance    | The Entity calculates and records the Input Percentage for a given Material Accounting Period using the following formula:<br>$\text{CoC Stock } n \text{ (Current month metal inventory)} = \text{CoC Stock } n-1 \text{ (Previous month CoC metal inventory)} + \text{CoC Input } n \text{ (CoC input current month)} - \text{CoC Output } n \text{ (CoC output current month CoC)}$ $\text{CoC Output } n = \text{CoC Shippings } n.$ |
| 8.5 Input Percentage (Aluminium Re-Melting/Refining) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                    |
| 8.6 Output Quantity determination                    | Conformance    | The Entity's ASI Procedure clearly outlines plans to use the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Materials, by mass.                                                                                                                                                                                                                                                       |
| 8.7 Output Quantity designation                      | Conformance    | The Entity's ASI Procedure provides for the designation of the Output Quantity of CoC Materials as 100% CoC Material. Tests on the accounting table and interviews with management confirmed the correct understanding of these requirements.                                                                                                                                                                                            |
| 8.8 Output Quantity - Pre-Consumer Scrap             | Conformance    | The Entity accounts for its Pre-Consumer Scrap, which it sends to the Aludium Spanish sites for remelting. The amounts are not subtracted from the Entity's respective Mass Balances as the Scrap remains intra-company material.                                                                                                                                                                                                        |
| 8.9 Outputs not exceed Inputs                        | Conformance    | The formulas and data incorporated by the Entity's Material Accounting System will ensure that the total output of CoC Material does not proportionally exceed the Input Percentage as applied to the total inputs of CoC Material during the defined period.                                                                                                                                                                            |
| 8.10a Internal Overdraws (not exceed 20%)            | Conformance    | An Internal Overdraw is not possible in the ERP system as if the Entity does not have sufficient stock of the CoC Material, the shipping will be blocked. In case of a Force Majeure situation creating a shortage of stock, the first decision would be to buy                                                                                                                                                                          |

| CRITERION                                             | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                       |             | more CoC Material from alternative suppliers. If this were not possible then the Entity would delay its order to the Aludium Amorebieta and Alicante sites until the correct stock with adequate specifications become available.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8.10b Internal Overdraws (not exceed affected amount) | Conformance | The Entity has built its Material Accounting System within its ERP system in a way that Internal Overdraws are not possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8.10c Internal Overdraws (period to make up)          | Conformance | The Entity has built its Material Accounting System within its ERP system in a way that Internal Overdraws are not possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8.11a Positive Balance (carry over)                   | Conformance | The Entity has defined a process for CoC Material management that collects data from the ERP System and determines the annual balance over twelve months, identifying the available stock and whether the balance is positive. This process has been tested by the Entity. The stock of CoC Material and shipments of CoC Material are monitored and the available stock is updated monthly. The annual balance is determined at the close of the accounting period. Since there has been no shipment of CoC Material to date, the annual balance sheet has not yet been drawn up. Therefore, this process was demonstrated in test mode only.                                               |
| 8.11b Positive Balance (expiry)                       | Conformance | The Entity has defined and implemented a process for CoC Material management which takes the data from the ERP system and determines that in the event of a positive twelve month final balance, these tonnes of CoC Material can be transferred to a new twelve month period. This metal must be used in the new period and cannot be transferred again.                                                                                                                                                                                                                                                                                                                                    |
| 9 ISSUING COC DOCUMENTS                               |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 9.1 Shipments and transfers                           | Conformance | <p>The Surveillance Audit confirmed that a robust system for documenting shipments is in place. The Entity has defined a process for CoC Material management, outlined in the ASI 001 Procedure which describes shipment control processes whereby the documents accompanying the material supplies are checked, including all the information required in the CoC Documents issued.</p> <p>The processes and documentation for shipment/transfer of CoC Material dispatched to other CoC Certified Entities were reviewed using the trial CoC Material batches still present in the ERP testing environment, as no CoC Material has been handled since the initial Certification Audit.</p> |

| CRITERION                  | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                            |             | A traceability exercise was successfully carried out with the Logistics Manager.                                                                                                                                                                                                                                                                                                                                                                   |
| 9.2a Date of issue         | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information. The whole process to generate a CoC Document was demonstrated during the Audit through a full simulation of the ERP system from the Data Manager. A CoC Document template with all the necessary information is provided in the Entity's ASI Procedure, which includes the date of issue of the CoC Document. |
| 9.2b Reference number      | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including a reference number for the CoC Document.                                                                                                                                                                                                                                                            |
| 9.2c Issuing Entity        | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the identity, address and CoC Certification number of the Entity issuing the CoC Document.                                                                                                                                                                                                          |
| 9.2d Receiving customer    | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the identity and address of the customer receiving the CoC Material.                                                                                                                                                                                                                                |
| 9.2e Responsible employee  | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the responsible employee of the Entity who can verify information in the CoC Document.                                                                                                                                                                                                              |
| 9.2f Conformance statement | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the statement confirming that 'The information provided in the CoC Document is in conformance with the ASI CoC Standard'.                                                                                                                                                                           |
| 9.2g Type of CoC Material  | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the type of CoC Material in the shipment.                                                                                                                                                                                                                                                           |
| 9.2h Mass of CoC Material  | Conformance | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the mass of CoC Material in the shipment.                                                                                                                                                                                                                                                           |

| CRITERION                                    | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.2i Mass of total material                  | Conformance    | The Entity has integrated into its ERP system the necessary functions to generate a CoC Document that contains relevant information, including the mass of total Material.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9.3a Sustainability Data (optional)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9.3b Sustainability Data (passing on)        | Conformance    | The Entity has made provision for Sustainability Data in the CoC Document. Data on the carbon footprint (Scopes 1, 2 and 3) of each Product is already contained in the ERP system and therefore can automatically be included in CoC Documents. An example of a CoC Document with all the necessary information has been included in the Entity's ASI Procedure. The following information can be inserted into a CoC Document: The mean (cradle to gate) of the tonnes of CO <sub>2</sub> equivalent per tonne Aluminium and the method used for its calculation; Text stating that 'Aludium, according to our purchasing code, does not accept metal from conflict or risk areas and to do so, it submits its suppliers to due diligence or metal audits.'; Content of recycled material (differentiating, if possible, in percentage, pre- and post- scrap); and the certificate validity date. |
| 9.3c Post-Casthouse ASI Certification status | Conformance    | The Entity has made provision for Sustainability Data in the CoC Document and can include the Entity's ASI Performance Standard certificate validity date.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9.4 Supplementary Information (optional)     | Not Applicable | This Criterion is not applicable, as the Entity does not intend to disclose Supplementary Information in CoC Documents.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 9.5 Response to verification requests        | Conformance    | The traceability and management of customer or supplier queries are integrated into the Entity's ERP system.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 9.6 Error management                         | Conformance    | The management of potential errors and customer and supplier complaints are integrated in the Entity's ERP system.<br>The Entity has developed and implemented a standalone procedure for managing non-conformities, which was updated in 2023 to implement Chain of Custody Standard requirements. The Entity also addresses error management as part of its Integrated Management System, which is certified to ISO 9001, 14001, 45001 and ISO 50001.                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10 RECEIVING COC DOCUMENTS                   |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10.1 Verify required information included    | Conformance    | The Entity has defined and implemented a process for CoC Material management with reference to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| CRITERION                                     | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                               |                | <p>ASI Procedure which includes receipt control procedures where the CoC Documents accompanying the CoC Material supplies are checked, including all the information required in the CoC Documents received.</p> <p>All Material receipts are supported by documents identifying the supplier, the type of Material, the quantity, the date and its designation in the ERP system as CoC Material or Non-CoC Material and tracing the associated purchase order. The documents accompanying the Material receipts include purchase order, delivery note, certificate of analysis and invoice.</p> |
| 10.2 Verify consistency with shipments        | Conformance    | Each delivery to the Entity is managed by the Logistics team which is trained to receive all types of supplies, both CoC Material and Non-CoC Material, and to check their condition following Entity and Group procedures and perform quality control, including the verification of the goods against the supplier's documents, including CoC Documents.                                                                                                                                                                                                                                        |
| 10.3 Verify supplier CoC Certification status | Conformance    | The Entity's exclusive supplier of Aluminium is a Certified Entity of the same Group. There are constant discussions between the different sites, and the Aluminium flows are managed through a single ERP system, therefore the ASI CoC Certification status of each site is always known.                                                                                                                                                                                                                                                                                                       |
| 10.4 Error management                         | Conformance    | The Entity addresses error management as part of its Integrated Management System, which is certified to ISO 9001, ISO 14001, ISO 45001 and ISO 50001. The traceability and management of customer and supplier complaints are integrated into the Entity's ERP system. The Entity also has a separate procedure for managing non-conformances which has been recently revised to address CoC Material. No errors have occurred to date as the flow of CoC Material has not yet commenced.                                                                                                        |
| 11 MARKET CREDITS SYSTEM: ASI CREDITS         |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11.1a Material Accounting System – allocation | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 11.1b Link to Casthouse Products              | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 11.1c No double counting                      | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 11.1d No Positive Balance for ASI Credits     | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| CRITERION                                              | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11.2a Date of issue                                    | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2b Reference number                                 | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2c Issuing Entity                                   | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2d Receiving Entity                                 | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2e Conformance statement                            | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2f ASI Credits statement                            | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.2g Quantity                                         | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3a CoC Certification Scope – purchasing ASI Credits | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3b Material Accounting System – purchasing          | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3c Expiry                                           | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3d No re-trading                                    | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3e No allocation to physical products               | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3f Verify supplier CoC Certification status         | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 11.3g Five years maximum for ASI Credits purchasing    | Not Applicable | This Criterion is not applicable as the Entity does not intend to participate in the Market Credit System.                                                                                                                                                                                                                    |
| 12 CLAIMS AND COMMUNICATIONS                           |                |                                                                                                                                                                                                                                                                                                                               |
| 12.1a ASI Claims Guide                                 | Conformance    | The Entity has developed a procedure for the correct use of the ASI Performance and Chain of Custody Standard Certified logos, as well as for communications made to clients or the public within the sales or marketing area. Claims about CoC Material will be managed at the Group-level. No claims have been made so far. |
| 12.1b Verifiable evidence                              | Conformance    | There is verifiable evidence to support the claims and/or representations made by the Entity; this is                                                                                                                                                                                                                         |

| CRITERION               | RATING      | COMMENT                                                                                                                                                                                                                                                                                            |
|-------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         |             | supported by the implementation of the Group's internal 'ASI Claims and Communications Procedure'.                                                                                                                                                                                                 |
| 12.1c Employee training | Conformance | Appropriate training is provided for relevant employees to properly understand and communicate the claims and/or representations. The Entity has created an ASI training log that identifies individuals whose roles require claims and communications training, and lists the presentations made. |

#### **Document Control and Version History**

| Revision | Date              | Notes                                            |
|----------|-------------------|--------------------------------------------------|
| 0        | 21 July 2023      | Initial Certification Audit – Full Certification |
| 1        | 24 September 2025 | Surveillance Audit – Full Certification          |