

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Dadco Alumina and Chemicals Limited

CERTIFICATE NUMBER

492

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

GUTcert (AFNOR
GROUP)

DATE OF ISSUE

24 SEPTEMBER 2025

DATE OF EXPIRY

23 SEPTEMBER 2028

CERTIFIED SINCE

24 SEPTEMBER 2025

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Dadco's Refining facilities,
Aluminium Oxid Stade GmbH (in
Stade, Germany)

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Dadco Alumina and Chemicals Limited
ENTITY NAME	Dadco Alumina and Chemicals Limited
CERTIFICATION SCOPE	Dadco's Refining facilities, Aluminium Oxid Stade GmbH (in Stade, Germany)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">2 - 4 December 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 July 2025
AUDIT SCOPE	<p>The Audit Scope included Aluminium Oxid Stade GmbH Dadco's Refining facilities in Stade, Germany.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	24 September 2025 – 23 September 2028
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DUE DATE	23 March 2027
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CERTIFICATE NUMBER	492
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Dadco Alumina and Chemicals Limited (the 'Entity') is part of an international group in the Aluminium industry and a leading European supplier of Alumina-based products, committed to the highest Environmental, Health and Safety Standards and certified to relevant ISO management systems. Its Aluminium Oxid Stade (AOS) refinery in Lower Saxony, Germany, produces over one million metric tonnes of Alumina annually using the Bayer process, supported by integrated port, administrative, and residue management facilities. The AOS refinery employs over 500 workers. In line with Aluminium Stewardship Initiative (ASI) principles, the Entity prioritises responsible sourcing, safe and efficient operations, environmental protection, community engagement, and transparent governance, ensuring sustainable and ethical Alumina production.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance.

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

OVERALL	
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member that is committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is a Member in the Production and Transformation category and is Certified to the ASI Performance Standard V2: https://aluminium-stewardship.org/wp-content/uploads/2025/04/ASI-Summary-Audit-Report-Dadco-Alumina-Chemicals-Certificate-3II-PS-Rev-1.pdf
1.2 CoC Management System	Conformance	The Entity has an established Management System to address all applicable requirements of the Chain of Custody (CoC) Standard, covering all Facilities under its control. The ASI CoC Standard Management Manual and relevant procedures and records are implemented. These documents include the purpose, scope, policies, responsibilities, risk assessment, improvement objectives, training, communication, internal audit, corrective action plan, document and record keeping, supplier management and workflow requirements of its ASI CoC Management System.
1.3 CoC Management System Monitoring	Conformance	The Entity has implemented a process to periodically review and update its CoC Management System, incorporating audit results, implementation experience and continuous improvement.
1.4 Management Representative	Conformance	The Entity has appointed the Head of Logistics as the Management Representative with defined authority and overall responsibility for ensuring conformance with the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has implemented communication and training measures to ensure that relevant personnel are aware of, and competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity maintains complete and up-to-date records in accordance with ASI Chain of Custody requirements and ensures secure retention of records for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7d Reporting to ASI (Positive Balance carried over)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7g Reporting to ASI (Intra-Entity Flows)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.

2. OUTSOURCING CONTRACTORS

2.1 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 (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity as it does not have any Outsourcing Contractors.
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 as it does not have any Outsourcing Contractors.
2.5 Error (Outsourcing Contractor)	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 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)	Conformance	The Entity produces ASI Alumina exclusively within its ASI CoC Certified refinery in Stade (Aluminium Oxid Stade (AOS)).

CRITERION	RATING	COMMENT
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity ensures that ASI Alumina is produced only at the AOS Stade facility, which is certified against the ASI Performance Standard, fulfilling all environmental, social, and governance requirements: https://aluminium-stewardship.org/wp-content/uploads/2025/04/ASI-Summary-Audit-Report-Dadco-Alumina-Chemicals-Certificate-311-PS-Rev-1.pdf
3.2c ASI Alumina (Bauxite sourcing)	Conformance	Whilst the Entity sources Bauxite an Entity in which it holds a shareholder position, ensuring 'end-to-end' legal and operational alignment within the certified supply chain, the Entity is not yet Certified to the Chain of Custody Standard at the time of the Audit. As such, the Entity acknowledges that no CoC Material can be produced until CoC Certification is achieved by that Entity. The Entity's Management System is fully prepared to ensure compliance once upstream CoC Certification is in place.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	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		

CRITERION	RATING	COMMENT
5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	The Entity has implemented a Responsible Sourcing Policy that includes a clear anti-Corruption commitment. The Entity communicates this Policy to all relevant suppliers, including those providing non-CoC Material and Trader-supplied CoC Material. The Responsible Sourcing Policy is available at: https://www.aos-stade.de/medien/attachments/AOS%20Supplier%20Code%20of%20Conduct%20EN.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity communicates its Responsible Sourcing Policy to all relevant suppliers, promoting transparency and sustainability in the Aluminium supply chain.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity integrates Human Rights Due Diligence into its Responsible Sourcing Policy and requires all suppliers to uphold these principles.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity's Responsible Sourcing Policy includes provisions for the identification of Conflict-Affected and High-Risk Areas (CAHRAs) in its supply chain and requires suppliers to apply Due Diligence aligned with OECD guidance.
7.2 Risk Assessment and Mitigation	Conformance	The Entity conducts documented risk assessments of its Tier 1 suppliers in accordance with its Responsible Sourcing Policy and implements mitigation measures where adverse risks are identified.

CRITERION	RATING	COMMENT
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has implemented a Complaints Resolution Mechanism that enables stakeholders to raise concerns about responsible sourcing practices in the Aluminium supply chain:</p> <p>https://dadcoalumina.com/about/</p> <p>https://www.aos-stade.de/medien/attachments/AOS%20Nachhaltigkeitsbericht%202024%20DE.pdf</p>

8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has implemented a documented Material Accounting System that ensures accurate tracking and mass balance control of CoC Material within the ASI Certification Scope.
8.2 Material Accounting Period	Conformance	The Entity has established a calendar year Material Accounting Period of twelve months.
8.3 Input and Inflow Quantities	Conformance	The Entity records Input Quantities of CoC and non-CoC Bauxite within the defined accounting period. No Scrap material is used as Inflows/Inputs.
8.4 Output Quantities of CoC Material	Conformance	The Entity applies a mass-balance method to determine the CoC Material Output based on the proportion of Certified CoC Material Input. The system ensures proportional and compliant CoC claims in accordance with ASI Chain of Custody requirements.
8.5 Indivisibility of CoC Material	Conformance	The Entity designates CoC Output as 100% CoC Material based on a verified mass balance.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity ensures that the total declared CoC Output does not exceed the proportional Input of Certified CoC Material over the accounting period.
8.8a Internal Overdraw (Not exceed 20%)	Minor Non-Conformance	The Entity's Material Accounting System allows for a controlled Internal Overdraw in Force Majeure situations. However, a documented procedure for implementing this mechanism is not yet in place.
8.8b Internal Overdraw (Not exceed force majeure situation)	Minor Non-Conformance	The Entity's Material Accounting System is conceptually capable of managing Internal Overdraws under Force Majeure. However, no documented procedure exists to ensure that such Overdraws are limited to the quantity of material affected by the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Minor Non-Conformance	The Entity's Material Accounting System lacks a documented procedure to ensure that any Internal Overdraw is reconciled in the following period, and to maintain mass balance integrity under the ASI Chain of Custody Standard.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System enables the identification and carry-over of unclaimed CoC Material to the following accounting

CRITERION	RATING	COMMENT
		period.
8.9b Positive Balance (Expiry)	Minor Non-Conformance	The Entity's Material Accounting System allows the carry-over of unclaimed CoC Material to the following accounting period however currently lacks a documented rule to ensure that such balances expire at the end of the subsequent accounting period.
9. ISSUING CoC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has established procedures and templates to ensure that every shipment of CoC Material will be accompanied by a CoC Document. The Document template has been developed in accordance with ASI Chain of Custody Standard requirements.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity ensures that each CoC Document includes a date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity assigns a unique reference number to each CoC Document, linked to its material accounting system.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Documents include the identity, address, and certification number of the issuing site, ensuring traceability.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity ensures that each CoC Document includes the recipient's identity and address, and where applicable, their ASI CoC Certification number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity includes the name and contact information of a responsible employee on each CoC Document to allow for direct verification of information.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity includes a formal conformance statement on each CoC Document, confirming that the information complies with the ASI Chain of Custody Standard.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity ensures that the type of CoC Material is clearly identified on each CoC Document.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity records the mass of CoC Material for each shipment on the CoC Document, in accordance with the traceability and mass balance requirements of the ASI Chain of Custody Standard.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity includes the total mass of Material in each CoC shipment on the CoC Document.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity does not currently include carbon footprint data in CoC Documents. This information may be included in future, and if this occurs, the information will be included in alignment with ASI Guidance and verified carbon accounting standards.

CRITERION	RATING	COMMENT
9.3b Sustainability Data (optional) – Origin information	Conformance	The Entity does not currently report material origin on its CoC Documents. This information may however be added in future to enhance transparency and support responsible sourcing.
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	Conformance	The Entity ensures that any supplementary information included in a CoC Document is supported by objective evidence, in accordance with ASI Chain of Custody Standard requirements.
9.5 Verification of Information	Conformance	The Entity has systems and personnel in place to respond to verification requests related to CoC Documents, ensuring transparency and credibility.
9.6 Error (Shipping)	Minor Non-Conformance	The Entity does not yet have a documented procedure for correcting CoC Document errors discovered after shipment.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity ensures that all required elements of CoC Documents received with CoC Material are verified for completeness and accuracy before entry into the Material Accounting System.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented procedures to verify the consistency of received CoC Material with its CoC Document before recording it in the accounting system. This system has not yet been applied, as no CoC Material has been received to date.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity is prepared to regularly verify the ASI CoC Certification status and scope of suppliers through the ASI website to ensure the validity of received CoC Material.
10.4 Error (Reception)	Minor Non-Conformance	The Entity does not yet have a documented process for resolving post-receipt errors in CoC Material or CoC Documents in collaboration with suppliers.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity does not currently make claims on CoC Material outside of CoC Documents. Systems are in place to ensure that any future claims will comply with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity ensures that any future claims about CoC Material will be substantiated with verifiable evidence based on traceable Input, Output, and Certification data.

CRITERION	RATING	COMMENT
11.1c Claims and Communications (Employee training)	Conformance	The Entity ensures that relevant employees are trained to correctly understand and communicate ASI CoC-related claims in accordance with the ASI Claims Guide and Chain of Custody requirements.

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	24 September 2025	Initial Certification Audit – Full Certification