

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Aluminium Bahrain B.S.C (Alba)

CERTIFICATE
NUMBER

268

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

DATE OF ISSUE

17 APRIL 2023

CERTIFICATION
LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

1 MARCH 2027

ASI ACCREDITED AUDITING
FIRM

CETIZION VERIFICA

CERTIFIED SINCE

17 APRIL 2023

AUTHORISED BY

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

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

Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation at the Alba Calciner and Alba Smelter in Bahrain.


AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Aluminium Bahrain
ENTITY NAME	Aluminium Bahrain B.S.C (Alba)
CERTIFICATION SCOPE	Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation at the Alba Calciner and Alba Smelter in Bahrain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (23 – 27 October 2022)Surveillance Audit (8 – 9 May 2024)
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">23 – 27 October 2022 (Initial Certification Audit)8 – 9 May 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 February 2023 (Initial Certification Audit)11 June 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 27 October 2022)</u></p> <p>The audit scope covers the business of production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting, and captive power generation.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (8 – 9 May 2024)</u></p> <p>The audit scope covers the business of production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting, and captive power generation.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance 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"> ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	17 April 2023 – 1 March 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	1 March 2027
CERTIFICATE NUMBER	268
<div style="display: flex; align-items: flex-start;">  <div> <p>If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: https://aluminium-stewardship.ethicspoint.com/</p> <p>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.</p> <p>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.</p> </div> </div>	

ENTITY OVERVIEW

Aluminium Bahrain (Alba) is one of the largest smelters in the world and currently produces over 1.56 million tonnes per annum. It has been in operation for over 50 years and is one of the most significant facilities in the Kingdom of Bahrain. Alba produces high-quality aluminium products in the form of Standard and Value-Added Products (VAP), which are exported to more than 240 global customers. As the first Aluminium smelter in the Middle East, Alba has been a major contributor to the social, industrial and economic development of the Kingdom of Bahrain. Alba consists of six potlines, four power stations providing a total capacity of over 2.2 Gigawatts (GW), three carbon plants, two cast houses, a desalination plant, a calciner plant and a marine terminal with jetty facility. It occupies over 1.2 square kilometres of land in the Askar Industrial Area, approximately 15 kilometres south of Manama. As one of the biggest national companies, Alba employs nearly 3,500 people, with nearly 85 percent of employees being Bahrain nationals.

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 assigned to a Sustainability Component.

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

OVERALL	
SYSTEMS	Medium
RISKS	High
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member and is in good standing in the Production and Transformation membership class.
1.2 CoC Management System	Conformance	The Entity has a Management System in place that adequately and appropriately addresses all the applicable requirements of the ASI Chain of Custody Standard; more specifically all Facilities within their CoC's Certification Scope that take Custody of CoC Material.
1.3 CoC Management System Monitoring	Conformance	<p>The Entity has established a process to ensure the Management System has been and will continue to be periodically reviewed and updated as the Entity matures in terms of implementation experience. This will include incorporating potential areas of Non-Conformance that may have been highlighted in previous audits.</p> <p>The ASI Certification performance is reviewed by management at various forums, the latest management review was conducted in February 2024.</p>
1.4 Management Representative	Conformance	The Chief Supply Officer has been appointed with overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has established, defined and implemented a framework to communicate training measures that will ensure relevant personnel are aware of their responsibilities according to the ASI Chain of Custody Standard. There is an annual training plan, and each month training is provided using standard training material for different departments (e.g. checked for Casthouse, procurement, strategic supply and planning (responsible for Alumina) departments).
1.6 Records Management	Conformance	The Entity has maintained up-to-date records of all applicable requirements, these records are to be retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has produced and submitted its Material Accounting System report for the period of January - December 2023 to the ASI Secretariat, and email communications have been verified.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has reported on the Inputs and Outputs of Eligible Scrap to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has reported on the Inflows and Outflows of Non-CoC Material to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has reported on the Positive Balance carried over to the ASI Secretariat in accordance with the appropriate reporting form

CRITERION	RATING	COMMENT
		(delivered by the 30th of June following the end of each calendar year).
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has reported on the Positive Balance used to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has reported on the Internal Overdraw drawn down to the ASI Secretariat in accordance with the appropriate reporting form (delivered by the 30th of June following the end of each calendar year).
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity uses a daily material tracking report. All materials going through the stages of the operation are traceable for Intra-Entity Flows.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.
2.5 Error (Outsourcing Contractor)	Not Applicable	The Criterion is not applicable as the Entity engages with CoC Certified raw material suppliers only on a direct contractual basis and does not engage with outsourced Contractors for any stage in the conversion of raw materials into finished goods.

CRITERION	RATING	COMMENT
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity is engaged in Aluminium Smelting, has a valid ASI membership, and has a highly secured Smelting Facility that ensures ASI Aluminium is produced from the smelters within their ASI CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity is engaged in Aluminium Smelting, has a valid ASI membership and is Certified against the ASI Performance Standard
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity sources ASI Alumina from other ASI CoC Certified Entities, and has a clear traceable system to differentiate Alumina coming from CoC Certified suppliers (90%) and other suppliers of Non-CoC Material (10%).
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Recyclable Scrap Material (Suppliers)		
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity is engaged in producing Casthouse Products, has a valid ASI membership and has a highly secured Casthouse Facility that ensures ASI Aluminium is produced from the Casthouses within their ASI CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity is engaged in producing Casthouse Products, has a valid ASI membership and is Certified against the ASI Performance Standard.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity is engaged in producing Liquid Aluminium and Casthouse Products, and has highly secured Smelting and Casthouse Facilities. ASI Aluminium (in liquid form) sourced only from the smelters within the Entity's ASI CoC Certification Scope.
5.2 Unique Identification	Conformance	The Entity has established systems to ensure that unique identification numbers, either physically stamped and/or printed on or with ASI Aluminium by the Entity, correspond to the Input Quantities of CoC Material for each specific Material Accounting Period. For Liquid Metal delivery to downstream customers, traceability is provided through the 'Charge Number' generated from the manufacturing execution system. For cast products, each cast at the time of batching is assigned a 'Cast Number'. Through the Cast Number, an unbroken chain of traceability is established at all stages of manufacturing operations, including backward traceability up to the reduction lines. The Sales Order Position report in SAP/MES shows linkages between a Sales Order with all the Production Orders, Cast Numbers, Quantities in stock and Quantities Delivered.
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		

CRITERION	RATING	COMMENT
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	<p>The Entity has updated and implemented its Sustainable & Responsible Sourcing Policy (available in English and Arabic language), approved by the Chief Executive Officer (dated 17 April 2024), which addresses Corruption (https://www.albasmelter.com/uploads/Sustainable_and_Responsible_Supply_Chain_Policy.pdf)</p> <p>The Policy has been communicated to, and acknowledged and implemented by suppliers of CoC Material (ASI Alumina) and Non-CoC Material, as demonstrated through self-assessed environmental, social and governance (ESG) questionnaires by suppliers with subsequent verification by the Entity.</p>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	<p>The Entity has updated and implemented its Sustainable & Responsible Sourcing Policy: https://www.albasmelter.com/uploads/Sustainable_and_Responsible_Supply_Chain_Policy.pdf</p> <p>The Policy has been communicated to, and acknowledged and implemented by suppliers of CoC Material (ASI Alumina) and Non-CoC Material, as demonstrated through self-assessed ESG questionnaires by suppliers with subsequent verification by the Entity.</p>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has updated and implemented its Sustainable & Responsible Sourcing Policy, which addresses Human Rights: https://www.albasmelter.com/uploads/Sustainable_and_Responsible_Supply_Chain_Policy.pdf</p> <p>The Policy has been communicated to, and acknowledged and implemented by suppliers of CoC Material (ASI Alumina) and Non-CoC Material, as demonstrated through self-assessed ESG questionnaires by suppliers with subsequent verification by the Entity.</p>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has updated and implemented its Sustainable & Responsible Sourcing Policy, which addresses Conflict-Affected and High-Risk Areas (CAHRAs): https://www.albasmelter.com/uploads/Sustainable_and_Responsible_Supply_Chain_Policy.pdf</p> <p>The Policy has been communicated to, and acknowledged and implemented by suppliers of CoC Material (ASI Alumina) and Non-CoC Material, as demonstrated through self-assessed ESG questionnaires by suppliers with subsequent verification by the Entity.</p>
7.2 Risk Assessment and Mitigation	Conformance	<p>The Entity has developed and implemented supply chain Due Diligence and has assessed associated risks including risk of Conflict-Affected and High-Risk Areas (CAHRAs). The Sustainable & Responsible Sourcing Policy has been communicated, acknowledged and implemented for both CoC and Non-CoC Alumina suppliers, as evidenced by the supplier's self-assessed ESG questionnaire and subsequent review by the Entity to verify completeness and compliance with the Responsible Sourcing Policy.</p>
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has implemented an accessible, transparent, understandable, and culturally and gender-sensitive, external Grievance Mechanism (via the Alba Integrity Line), which is adequate</p>

CRITERION	RATING	COMMENT
		to address all relevant Stakeholder complaints, grievances and requests for information relating to its operations.
8. MASS BALANCE SYSTEM: CoC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established and is currently implementing a CoC Management System and a Material Tracking System that safeguards the overall integrity of the CoC Material and the Eligible Scrap Mass Balance (within the Certification Scope). The Entity shares their CoC Material Tracking System with ASI. This form is dedicated to consolidating data from various departments into one comprehensive tracking sheet. This procedure is a main component in effectively implementing the newly established Alba CoC Management System.
8.2 Material Accounting Period	Conformance	The Entity has specified and maintained a Material Accounting System for the reporting period January 1st - December 31st of each calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and implemented a system to maintain the Input and Inflow Quantities of CoC Material via an ASI CoC Material tracking Excel sheet.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and implemented a system to maintain the Output Quantities of ASI CoC Material via an ASI CoC Material tracking Excel sheet.
8.5 Indivisibility of CoC Material	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system also ensures that the Output Quantity of CoC Material, which may be a subset of total production, shall be designated as 100% CoC Material.</p>
8.6 Output Quantity of Eligible Scrap	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system also considers if the Entity generates Scrap and where it intends to designate the relevant proportion as Eligible Scrap, the Entity shall, for the given Material Accounting Period, use the same percentage share as for its Output of ASI Aluminium.</p>
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.

CRITERION	RATING	COMMENT
		This system ensures that the total the Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>Where Coc Material is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that does not exceed 20% of total Input Quantity of CoC Material, and which is made up within the subsequent Material Accounting Period.</p>
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>Where Coc Material is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that does not exceed the amount of CoC Material affected.</p>
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System. This system ensures that where CoC Material is under contract for delivery to an Entity within a given Material Accounting Period.</p> <p>Where Coc Material is subject to a Force Majeure situation, the Entity's Material Tracking System may draw down an Internal Overdraw that does not exceed 20% and which is made up within the subsequent Material Accounting Period.</p>
8.9a Positive Balance (Carry over)	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.</p> <p>This system ensures that any carry over of a Positive Balance will be identified if the Entity opts to carry it over to the subsequent Material Accounting Period.</p>
8.9b Positive Balance (Expiry)	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual' and is currently implementing a system outlined in the manual that utilises a specialised form and consolidates all pertinent data from various departments into a unified tracking sheet called Alba CoC Material Tracking System.

CRITERION	RATING	COMMENT
		This system ensures that any carry over of a Positive Balance will be identified if the Entity opts to carry it over to the subsequent Material Accounting Period and that this Positive Balance may not be further carried over after this subsequent Material Accounting Period.
9. ISSUING CoC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has established the 'Alba Chain of Custody Management System Manual', which addresses the details required for CoC Documents, Sustainability Data and Supplementary Information. The Entity did not issue any CoC Documents during the 2023 Material Accounting Period.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes a reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Document template for the shipment of its CoC ASI Aluminium includes details of the Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the receiving customers' details.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the names and positions of responsible employees.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes a statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the mass of total material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the average (preferably cradle-to-gate) carbon footprint of the CoC Material and the accounting method applied.

CRITERION	RATING	COMMENT
9.3b Sustainability Data (optional) – Origin information	Conformance	The Entity's CoC Document template for the shipment of its ASI Aluminium includes the origin of Aluminium.
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	Where the Entity's CoC Document contains Supplementary Information, Objective Evidence will support the information.
9.5 Verification of Information	Conformance	The Entity's CoC Management System Manual outlines the procedures for verifying information presented in CoC Documents originating from the Entity.
9.6 Error (Shipping)	Conformance	Through the CoC Management System, the Entity has established a system to ensure that any error that is discovered after CoC Material has been shipped will be documented by both the Entity and the receiving party. Corrective actions to avoid a recurrence will also be implemented and agreed on by the same parties.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	<p>The Entity has established the 'Alba Chain of Custody Management System Manual', which addresses the details for receiving CoC Documents and includes specific procedures to verify that all required information is received, and CoC Documents are complete.</p> <p>The Entity has not received CoC Material or any CoC Documents during the Material Accounting Period between January – December 2023.</p>
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity utilises a Manufacturing Execution System (MES) that verifies the consistency of the CoC Documents along with the accompanying CoC Material or Eligible Scrap before recording information in the CoC Material tracking system.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has regularly monitored the ASI website to verify the validity and scope of its supplier's ASI CoC Certification and monitor any changes that could affect the status of the CoC Material/Eligible Scrap supplied.
10.4 Error (Reception)	Conformance	Through the CoC Management System, the Entity has established a system to ensure that any error that is discovered after CoC Material or Eligible Scrap has been received will be documented by both the Entity and the supplying party. Corrective actions to avoid a recurrence will also be implemented and agreed on by the same parties.

CRITERION	RATING	COMMENT
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity's ASI CoC procedure covers claims and communications in conformance with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity is preparing all necessary documentation, procedures, and training programs according to the established 'Alba Chain of Custody Management System Manual' compliant with the ASI Claims Guide.
11.1c Claims and Communications (Employee training)	Conformance	The Entity intends to make claims and communications about CoC Material outside of CoC Documents. The Entity is preparing all necessary documentation, procedures, and training programs according to the established 'Alba Chain of Custody Management System Manual' compliant with the ASI Claims Guide.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 April 2023	Initial Certification Audit – Full Certification
1	11 June 2024	Surveillance Audit
2	1 August 2024	Corrected 'Next Audit Due Date' from 16 April 2024 to 16 April 2026, and updated 'ASI Accredited Auditing Firm' from DNV Business Assurance Services UK Ltd. to CETIZION Verifica
3	9 December 2025	Extension to the Next Audit Due Date, consistent with ASI's voluntary option for CoC Standard Certification extension