

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Oetinger Aluminium GmbH

CERTIFICATE NUMBER

263

ASI STANDARD

CHAIN OF CUSTODY
(v2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED AUDITOR

GUTCERT (AFNOR
GROUP)

DATE OF ISSUE

29 MARCH 2023

DATE OF EXPIRY

1 MARCH 2027

CERTIFIED SINCE

29 MARCH 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to read "J. H. C." followed by a long horizontal line for a signature.

CERTIFICATION SCOPE

Production of recycled aluminium alloys
in form of liquid metal and ingots,
including refining process, at the
Weißenhorn and Neu-Ulm sites,
Germany.

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

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

| | |
|-------------------------------|--|
| MEMBER NAME | Oetinger Aluminium |
| ENTITY NAME | Oetinger Aluminium GmbH |
| CERTIFICATION SCOPE | Production of recycled aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm sites, Germany. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses |
| ASI STANDARD | <ul style="list-style-type: none">• 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">• 24 – 26 October 2022 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">• 14 February 2023 |
| AUDIT SCOPE | <p>The audit scope covered the production of aluminium alloys at the Weißenhorn and Neu-Ulm plants.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses <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"><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

29 March 2023 – 1 March 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DUE DATE

1 March 2027

CERTIFICATE NUMBER

263



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

Oetinger Aluminium GmbH has two production sites: Weißenhorn (headquarters) and Neu-Ulm, both located in southern Germany (approx. 120 km west of Munich). The predecessor of the company was founded in 1946 (see history details on the entity's webpage: <https://www.oetinger.net/en/Company.php>).

Oetinger purchases recycled materials and scrap that contain aluminium, such as waste metal, chips, sheet metal scrap, shredder, sections and packaging materials.

As a remelter/refiner, Oetinger is a supplier of aluminium casting alloys, especially in the automotive industry. The two plants produce approx. 180,000 t/year of aluminium casting alloys in solid (ingots) and liquid form (tankers).

The sites are not located in the vicinity of world heritage monuments or areas. There are no Indigenous Peoples present in the country.

The latest construction work involved the addition of a new storage area including a new roof.

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 | High |
| RISKS | High |
| PERFORMANCE | Medium |
| OVERALL | HIGH |

FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| 1. MANAGEMENT SYSTEM AND RESPONSIBILITIES | | |
| 1.1 ASI Membership | Conformance | <p>Oetinger Aluminium GmbH is a member of ASI:</p> <p>https://aluminium-stewardship.org/about-asi/asi-members/oetinger-aluminium</p> <p>The Entity has achieved Certification against the ASI Performance Standard.</p> |
| 1.2 CoC Management System | Conformance | <p>The Entity has implemented a Management System that has been designed to specify the internal processes as well as competencies and responsibilities to ensure compliance with all applicable requirements of the ASI Chain of Custody (CoC) Standard. The Management System is defined in a management manual.</p> <p>Senior management has appointed a responsible person to ensure the Entity meets the requirements of the ASI Chain of Custody Standard and periodically reports on the effectiveness of the Management System to management. Relevant staff have been trained on the CoC requirements.</p> |
| 1.3 CoC Management System Monitoring | Conformance | <p>The Entity has established a mechanism for the periodic review and update of the CoC Management System, in line with other facets of the integrated Management System.</p> <p>Due to the lack of actual CoC Material sold at the time of this initial audit, the review was limited to the CoC system design, not yet the system's performance.</p> |
| 1.4 Management Representative | Conformance | <p>The Entity's Quality Manager is in charge of the implementation of and compliance with the ASI Chain of Custody Standard requirements. The role and responsibilities are defined in writing and are communicated within the Entity.</p> |
| 1.5 Communications and Training | Conformance | <p>The Entity has prepared and conducted specific training on the requirements of the ASI Chain of Custody Standard for relevant personnel and has planned CoC related communication to all employees.</p> |
| 1.6 Records Management | Conformance | <p>The Entity has implemented a procedure to maintain records covering all applicable requirements of the ASI Chain of Custody Standard for at least the required five-year period.</p> |
| 1.7a Reporting to ASI (Inputs and Outputs of CoC Material) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include Input and Output Quantities of CoC Material/s to/from the Certified Entity over the calendar year.</p> <p>A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity.</p> |
| 1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include Input and Output Quantities of Eligible Scrap to/from the Certified Entity over the calendar year.</p> |

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| | | A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity. |
| 1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the Inflow and Outflow Quantities of Non-CoC Material/s to/from the Certified Entity over the calendar year.</p> <p>A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity.</p> |
| 1.7d Reporting to ASI (Positive Balance carried over) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the Positive Balance carried over to the subsequent Material Accounting Period, if any.</p> <p>A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity.</p> |
| 1.7e Reporting to ASI (Positive Balance used) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.</p> <p>A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity.</p> |
| 1.7f Reporting to ASI (Internal Overdraw drawn down) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting will include the Internal Overdraw within the calendar year, if any.</p> <p>A report has not yet been issued, as at the time of the initial audit, CoC Material had not been handled by the Entity.</p> |
| 1.7g Reporting to ASI (Intra-Entity Flows) | Conformance | <p>The provisions of the Entity for annual reporting to the ASI Secretariat are documented in a procedure. Reporting is designed to include the Quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity Flows) over the calendar year.</p> |

2. OUTSOURCING CONTRACTORS

| | | |
|---|----------------|---|
| 2.1 Certification Scope | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 2.2a Control of CoC Material (Legal ownership or control) | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 2.2b Control of CoC Material (No further outsourcing) | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 2.2c Control of CoC Material (Risk assessment) | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| 2.3 Information on Quantity of CoC Material Output and Returned | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 2.5 Error (Outsourcing Contractor) | Not Applicable | This Criterion is not applicable, as the Entity does not outsource ASI Material to Contractors. |
| 3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM | | |
| 3.1a ASI Bauxite (CoC Certification Scope) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.1b ASI Bauxite (Performance Standard) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.1c ASI Bauxite (Bauxite sourcing) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.2a ASI Alumina (CoC Certification Scope) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.2b ASI Alumina (Performance Standard) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.2c ASI Alumina (Bauxite sourcing) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.3a ASI Aluminium (CoC Certification Scope) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP | | |
| 4.1a Recycled Aluminium (CoC Certification Scope) | Conformance | The Entity is engaged in Aluminium Re-Melting/Refining. As a supplier of Aluminium casting alloys, the Entity's Products are Liquid Metal and Aluminium alloy ingots. These are produced only at the Entity's two production plants Weißenhorn and Neu-Ulm, both within the Entity's CoC Certification Scope. |
| 4.1b Recycled Aluminium (Performance Standard) | Conformance | The Entity's Products are produced only at the Entity's two production plants Weißenhorn and Neu-Ulm, both are certified against the ASI Performance Standard: https://aluminium-stewardship.org/about-asi/asi-members/oetinger-aluminium |
| 4.2a Eligible Scrap (Pre-Consumer) | Conformance | The Entity has established procedures and processes to verify Pre-Consumer Scrap as designated CoC Material. Internally Generated |

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| | | Scrap is re-fed into production. These quantities are reflected in the Entity's Mass Balance System. |
| 4.2b Eligible Scrap (Post-Consumer) | Conformance | Post-Consumer Scrap is accounted for as Eligible Scrap by the Entity unless the Due Diligence assessment identified an unacceptable risk level. |
| 4.2c Eligible Scrap (Dross) | Conformance | The Inflow of Dross, Aluminium recovered from Dross or other aluminium containing wastes is managed the same way as other Aluminium scrap. All suppliers of such material must pass the Entity's supplier Due Diligence prior to any shipment. |
| 4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers) | Conformance | The Entity has established a process to gather and verify information on their suppliers of Recyclable Scrap. |
| 4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions) | Conformance | The Entity purchases all metal scrap via bank transfer, and no cash payments are made. This was confirmed by records reviewed during the audit. |
| 5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM | | |
| 5.1a ASI Aluminium (CoC Certification Scope) | Conformance | The Entity's two Casthouses in Neu-Ulm and Weißenhorn are within the CoC Certification Scope. All sites within the Entity are owned by Oetinger Aluminium GmbH, as confirmed by management and document review. |
| 5.1b ASI Aluminium (Performance Standard) | Conformance | The Entity has two production sites: Weißenhorn and Töging. Both plants are ASI Performance Standard Certified (Certification number 64) and the current certification status is available on the ASI website's member page: https://aluminium-stewardship.org/about-asi/asi-members/oetinger-aluminium The Entity does not use other external casthouses. |
| 5.1c ASI Aluminium (Aluminium sourcing) | Conformance | As the Entity is engaged in producing Casthouse Products, it has established a procedure to ensure that for ASI Aluminium, all Primary Aluminium is sourced only from Casthouses that are either ASI CoC Certified themselves or via traders, where the source of the material can be identified and which provide verified CoC Documents. |
| 5.2 Unique Identification | Conformance | The Entity's Material Accounting System is designed to ensure that all Input and Output of CoC Material are identified by unique identification numbers. These numbers are traceable within the Entity's enterprise-resource-planning (ERP) system. All Output Quantity of ASI CoC Material can be linked to the Input Quantity of CoC Material for a given Material Accounting Period. Solid ASI Aluminium will be stamped with a unique batch number and physically marked as CoC Material. |
| 6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM | | |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| 6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.1b Post-Casthouse ASI Aluminium (Performance Standard) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| 7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL | | |
|---|-------------|---|
| 7.1a Responsible Sourcing Policy (Anti-corruption) | Conformance | <p>The Entity has communicated its Supplier Code of Conduct to suppliers. The Code contains an anti-Corruption requirement:</p> <p>https://www.oetinger.net/de/PDF/Zertifikate/Code_of_Conduct_Suppliers_2022_ENG.pdf</p> |
| 7.1b Responsible Sourcing Policy (Responsible sourcing) | Conformance | <p>The Entity has communicated its Supplier Code of Conduct to their suppliers. The Code contains a responsible sourcing requirement:</p> <p>https://www.oetinger.net/de/PDF/Zertifikate/Code_of_Conduct_Suppliers_2022_ENG.pdf</p> |
| 7.1c Responsible Sourcing Policy (Human rights due diligence) | Conformance | <p>The Entity has communicated its Supplier Code of Conduct to their suppliers. The Code contains a Human Rights Due Diligence requirement:</p> <p>https://www.oetinger.net/de/PDF/Zertifikate/Code_of_Conduct_Suppliers_2022_ENG.pdf</p> |
| 7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas) | Conformance | <p>The Entity has communicated its Supplier Code of Conduct to their suppliers. The Code contains a Conflict-Affected and High-Risk Areas requirement:</p> <p>https://www.oetinger.net/de/PDF/Zertifikate/Code_of_Conduct_Suppliers_2022_ENG.pdf</p> |
| 7.2 Risk Assessment and Mitigation | Conformance | <p>The Entity has implemented a process to assess the risks of non-compliance with its Supplier Code of Conduct. Based on the result, further information is gathered, and the risk assessment is updated.</p> |
| 7.3 Complaints Resolution Mechanism | Conformance | <p>The Entity has established a Complaints Resolution Mechanism, adequate to the size and nature of the business.</p> <p>Complaints can be raised by e-mail, phone or in written form. For further information:</p> <p>https://www.oetinger.net/de/Kontakt.php</p> |

| 8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM | | |
|--|-------------|--|
| 8.1 Material Accounting System | Conformance | <p>The Entity's Management System includes a Material Accounting System that records Input Quantity, in-stock quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. Quantities</p> |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | of Pre- and Post-Consumer Scrap is recorded. The Material Accounting System is based on the Entity's enterprise-resource-planning (ERP) system. |
| 8.2 Material Accounting Period | Conformance | The Entity has specified in writing, that the Material Accounting Period in the Entity's Material Accounting System is 12 months starting from the first day of the calendar year. |
| 8.3 Input and Inflow Quantities | Conformance | In a documented procedure, the Entity has specified how to record the quantities of each CoC Material and Eligible Scrap Input and the Quantities of Non-CoC Material and Recyclable Scrap Material Inflow to the Certification Scope. The Inflow Quantity of Eligible Scrap and Recyclable Scrap Material is based on an assessment of Aluminium content. Data will be recorded in the Entity's ERP system. |
| 8.4 Output Quantities of CoC Material | Conformance | The Input Percentage for a given Material Accounting Period is used to calculate the Output Quantity (by mass), proportional to total Inflows of CoC and Non-CoC Materials. |
| 8.5 Indivisibility of CoC Material | Conformance | In a documented procedure the Entity has specified that the Output Quantity of CoC Material shall be designated as 100% CoC Material. |
| 8.6 Output Quantity of Eligible Scrap | Conformance | The Entity has established that the Output Quantity of CoC Material is designated as 100% CoC Material. As a remelter/refiner, all Aluminium-containing scrap and Dross are circulated and processed internally. Therefore, no Aluminium Scrap will leave the boundary of the system. |
| 8.7 Consistency Between Input Percentage and Total Output | Conformance | By system design, it is ensured that the total Output of CoC Material and Eligible Scrap does not proportionally exceed the Input Percentage as applied to the total Input of CoC Material and Eligible Scrap over the Material Accounting Period. |
| 8.8a Internal Overdraw (Not exceed 20%) | Conformance | The Entity's Material Accounting System is designed to ensure a maximum 20% Internal Overdraw of total Input Quantity of CoC Material within the Material Accounting Period in the case of Force Majeure. |
| 8.8b Internal Overdraw (Not exceed force majeure situation) | Conformance | The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will not exceed the amount of CoC Material affected by the Force Majeure situation. |
| 8.8c Internal Overdraw (Made up within subsequent Material Accounting Period) | Conformance | The Entity's Material Accounting System is designed to ensure that any Internal Overdraw will be made up within the subsequent Material Accounting Period. |
| 8.9a Positive Balance (Carry over) | Conformance | The Entity's Material Accounting System is designed to ensure that any carry over of a Positive Balance is clearly identified. |

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| 8.9b Positive Balance (Expiry) | Conformance | The Entity's Material Accounting System is designed to ensure that where the Entity has a Positive Balance of Output CoC Material at the end of a given Material Accounting Period, this will be carried over to the subsequent Material Accounting Period but will be either drawn down or expire at the end of the subsequent accounting period. |
| 9. ISSUING COC DOCUMENTS | | |
| 9.1 CoC Document | Conformance | <p>The Entity has defined a system to produce, control and store CoC Documents.</p> <p>At the time of the audit, there were no examples of effective implementation as the Entity had not yet sourced CoC Material.</p> |
| 9.2a CoC Document Content (Date of issue) | Conformance | The Entity has established a system to produce CoC Documents with a date of issue. |
| 9.2b CoC Document Content (Reference number) | Conformance | The Entity has established a system to produce CoC Documents with a reference number. |
| 9.2c CoC Document Content (Issuing Entity) | Conformance | The Entity has established a system to produce CoC Documents with the issuing Entity details (identity, address and CoC Certification number). |
| 9.2d CoC Document Content (Receiving customer) | Conformance | The Entity has established a system to produce CoC Documents with information on the receiving customer (identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number). |
| 9.2e CoC Document Content (Responsible employee) | Conformance | The Entity has established a system to produce CoC Documents which include the name of the responsible employee of the Entity who can verify information in the CoC Document. |
| 9.2f CoC Document Content (Conformance statement) | Conformance | The Entity has established a system to produce CoC Documents with 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 has established a system to produce CoC Documents including the type of CoC Material in the shipment. |
| 9.2h CoC Document Content (Mass of CoC Material) | Conformance | The Entity has established a system to produce CoC Documents which include the mass of CoC Material. |
| 9.2i CoC Document Content (Mass of total material) | Conformance | The Entity has established a system to produce CoC documents which include the mass of total Material in the shipment. |
| 9.3a Sustainability Data (optional) - Carbon footprint | Conformance | The Entity has established a template for issuing CoC Documents. The inclusion of Sustainability Data in the CoC Document will be on a case-by-case basis. Data may include the average carbon footprint of the CoC Material and the accounting method applied. |

| CRITERION | RATING | COMMENT |
|---|----------------|--|
| 9.3b Sustainability Data (optional) - Origin information | Conformance | The Entity has established a template for issuing CoC Documents. The inclusion of Sustainability Data in the CoC Document will be on a case-by-case basis. Data may include information to support the origin of Aluminium as per the ASI Performance Standard requirement. |
| 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 | <p>The inclusion of Supplementary Information in the CoC Document will be on a case-to-case approach.</p> <p>In a documented procedure it is specified that the Entity shall ensure that the Supplementary Information can be supported by objective evidence. All CoC Documents will be issued by the Entity's ASI Manager.</p> |
| 9.5 Verification of Information | Conformance | <p>The Entity has established a documented procedure for managing CoC communications with customers.</p> <p>At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.</p> |
| 9.6 Error (Shipping) | Conformance | <p>The Entity has implemented a documented procedure for managing CoC Documents as required by the ASI Chain of Custody Standard and a management system for potential errors.</p> <p>At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.</p> |

10. RECEIVING COC DOCUMENTS

| | | |
|---|-------------|---|
| 10.1 Verification of CoC Documents | Conformance | <p>The Entity has defined in their management procedure how to verify received CoC Documents.</p> <p>As there has been no sourcing of CoC Material at the time of the audit, the effectiveness of this verification will be assessed at the next audit.</p> |
| 10.2 Verification of Consistency Between CoC Documents and CoC Material | Conformance | <p>The Entity has defined in their management procedure how to verify received CoC Documents. All deliveries are to be verified when entering the site prior to data being entered into the internal IT system.</p> <p>As there has been no sourcing of CoC Material at the time of the audit, the effectiveness of this verification will be assessed at the next audit.</p> |
| 10.3 Verification of Supplier's ASI CoC Certification | Conformance | <p>The Entity has defined a check of the validity and scope of Aluminium suppliers' ASI CoC Certification before the first shipment and annually thereafter.</p> |
| 10.4 Error (Reception) | Conformance | <p>The Entity has specified in a procedure the management of errors if discovered after CoC Material or Eligible Scrap has been received.</p> |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | As there has been no sourcing of CoC Material at the time of the audit, the effectiveness of this verification will be assessed at the next audit. |
| II. CLAIMS AND COMMUNICATIONS | | |
| II.1a Claims and Communications (ASI Claims Guide) | Conformance | The Entity has established a documented procedure and prepared internal training to ensure any external communication is consistent with the ASI Claims Guide. Any external communication regarding ASI outside CoC Documents must be approved by the Entity's ASI Manager. |
| II.1b Claims and Communications (Verifiable evidence) | Conformance | The Entity has established a documented procedure to ensure any external communication is consistent with the ASI Claims Guide and only verifiable claims are made. |
| II.1c Claims and Communications (Employee training) | Conformance | The Entity has prepared and conducted training to ensure any external communication is consistent 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 | 29 March 2023 | Initial Certification Audit – Full Certification |
| 1 | 3 February 2026 | Extension to the Certification expiry and Next Audit date (from 28 March 2026), consistent with ASI's voluntary option for CoC Standard Certification extensions |