ASI CERTIFICATION
CHAIN OF CUSTODY STANDARD

ASI CERTIFIED
CHAIN OF CUSTODY

PRESENTED TO

Metlen Energy & Metals S.A

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
229	**CHAIN OF CUSTODY (V2 2022)**	**FULL CERTIFICATION**	**EUROCERT S.A.**
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	2 AUGUST 2024	**1 AUGUST 2027**	**17 OCTOBER 2022**

AUTHORISED BY

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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***

CERTIFICATION SCOPE

Metlen Energy and Metals –
Metals Sector (Greece), including:

- Bauxite mining activities of the European Bauxites site.
- Refining, smelting and Casthouse activities at the Aluminium of Greece Plant.
- Port Facilities at the Aluminium of Greece Plant.
- Metlen Energy and Metals corporate headquarters in Athens.

AUDIT REPORT
CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Metlen Energy & Metals S.A.
ENTITY NAME	Metlen Energy & Metals S.A.
CERTIFICATION SCOPE	Metlen Energy and Metals – Metals Sector (Greece), including: - Bauxite mining activities of the European Bauxites site. - Refining, smelting and Casthouse activities at the Aluminium of Greece Plant. - Port Facilities at the Aluminium of Greece Plant. - Metlen Energy and Metals corporate headquarters in Athens.
SUPPLY CHAIN ACTIVITIES	• Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses
ASI STANDARD	• Chain of Custody Standard V2
AUDIT TYPE	• Initial Certification Audit (25 – 27 July 2022) • Re-Certification Audit and Scope Change (17 - 18 June 2024) • Surveillance Audit (8 – 9 June 2026)
AUDIT FIRM	EUROCERT S.A.
AUDIT DATE	• 25 – 27 July 2022 (Initial Certification Audit) • 17 – 18 June 2024 (Re-Certification Audit and Scope Change) • 8 – 9 June 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 15 September 2022 (Initial Certification Audit) • 23 July 2024 (Re-Certification Audit and Scope Change) • 29 June 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (25 – 27 July 2022) The Audit Scope includes all activities at the Delphi Distomon site (Greece) and the Aluminium of Greece Plant and headquarters in Athens (Greece). Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses All applicable Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

	Re-Certification Audit and Scope Change (17 – 18 June 2024) The Audit Scope includes all activities at the Delphi Distomon site (Greece) and the Aluminium of Greece Plant and headquarters in Athens (Greece). Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses All applicable Criteria in the ASI Chain of Custody Standard were included in the Audit Scope. Surveillance Audit (8 – 9 June 2026) The Audit Scope includes all activities at the European Bauxites site (Greece) and the Aluminium of Greece Plant and headquarters in Athens (Greece). Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses All applicable Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	2 August 2024 – 1 August 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	1 August 2027
CERTIFICATE NUMBER	229
	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

The Metlen Energy and Metals - Metals Sector (the 'Entity') located in Greece, includes Bauxite Mining activities at the European Bauxites site, refining, smelting and Casthouse activities at the Aluminium of Greece Plant, port Facilities at the Aluminium of Greece Plant and, Metlen Energy and Metals corporate headquarters in Athens.

The Aluminium of Greece plant has been in operation for 60 years and has invested over €600 million in the technological upgrade of its Facilities and the improvement of productivity and output. Due to the Aluminium of Greece plant, Metlen Energy and Metals is the largest vertical producer of Aluminium and Alumina in Europe. It has an annual production capacity of 860,000 tonnes of Alumina and 190,000 tonnes of Primary Aluminium. Aluminium of Greece produces Primary Aluminium products (billets and slabs) by applying the Hall–Héroult process. For Aluminium production, the Aluminium of Greece industrial complex is comprised of:

- An Aluminium smelter with annual production of liquid Aluminium exceeding 190,000 tonnes/year
- An anodes production unit with annual production exceeding 94,000 tonnes of baked anodes
- A Casthouse with annual production of more than 120,000 tonnes in Aluminium billets and 70,000 tonnes in slabs.

The Aluminium of Greece plant is located 160 kilometres (km) from Athens and 30 km from Levadia in the Corinth Gulf in Viotia. The plant operates a private port for importing raw materials and exporting end products. The plant has approximately 1,100 employees on site with a further 560 Contractors engaged on a full-time basis. The company is committed to an Environmental Management System (ISO 14001:2015) alongside a Health and Safety Management System (ISO 45001:2018) and a Quality Management System (ISO 9001 :2015).

In 1963, the installation of the industrial plant of 'Aluminium of Greece S.A.' away from the populated areas of the Prefecture of Viotia led to the need for the company to create a local community to accommodate the families of its employees. Thus, the 'Aspra Spitia' (literally, 'White Houses') settlement was created at Antikyra Cove. Today 'Aspra Spitia' is a large modern village with a population of around 3,000 people.

European Bauxites is a subsidiary company of Metlen Group S.A., is the largest Bauxite producer in Greece and furthermore in Europe, with an annual production of 1,1 Mtn (2025), originated from 14 underground mines. The majority of production was sold at AoG (Aluminium of Greece). All underground mines are mostly in development and mine-out phase. Future planning aims at keeping the volume of production at current levels.

The company was created from a merger of the companies 'Delphi-Distomon Mining S.A' and 'Imerys Bauxites Greece S.A', and it is based in Athens, while Technical Management overseeing production and research activities is located approximately 50 kilometres away at Gravia, Fokida District. The Facility includes administrative offices, heavy & mobile equipment maintenance area, medical clinic, rehabilitation & topography offices, equipment, supply and fuel storage. The Technical Management integrates Health, Safety, Environment & Certifications services, alongside the rehabilitation of mining affected areas. The areas returned to Forest Agency fully rehabilitated & self-maintained is 594 hectares (ha), while, until today (2025), an area of 659 ha has been under rehabilitation. The Entity currently employs approximately 310 employees and 305 Contractors.

The nearest township to the Entity is Amfissa, located approximately 25km away. The nearby sensitive receptors include the Parnassus Classified Forest (24km east) and Gkiona Forest (35km west). Key external Stakeholders include the Government of Greece, the local town of Amfissa and local villages of Gravia, Viniani, Variani (Delphi Prefecture).

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	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	In June 2024, the Entity changed its name from Mytilineos S.A. to Metlen Energy & Metals S.A. Metlen has been an ASI member in the Production and Transformation class since 2019. The Entity is committed to complying with the requirements of ASI. Further information is available at: https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-
1.2 CoC Management System	Conformance	The Entity has established a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. The Entity's Management System for ASI Chain of Custody Standard Certification is linked to the existing Quality Management System. It is based on existing procedures that have been reviewed, and new procedures have been developed to implement the Standard. These procedures describe the objectives, governance model, scope, responsibilities, and handling of ASI Chain of Custody (CoC) Material and Non-CoC Material, including calculation methods for the Material Accounting System. The Entity has an integrated supply chain and has direct control of Facilities from the Bauxite Mine and Alumina production to Casting.
1.3 CoC Management System Monitoring	Conformance	The Entity has established a Management System and implemented a CoC Manual. The CoC Manual describes in detail the Entity's Material Accounting System and its use. The Entity's Aluminium of Greece Plant has implemented a System to account for the quantity of Bauxite from the European Bauxites mine, as Aluminium of Greece Plant is its sole customer.
1.4 Management Representative	Conformance	The Entity has nominated a senior Management Representative with the overall responsibility for implementation of the ASI Chain of Custody Standard. The Entity has also identified a cross-functional operational team responsible for the operational implementation of the Standard.
1.5 Communications and Training	Conformance	The Entity has developed and implemented communication and training measures to ensure relevant personnel are aware of and competent in their responsibilities under the ASI Chain of Custody Standard. Adequate training has been provided to the CoC operational team.
1.6 Records Management	Conformance	The Entity maintains up-to-date records according to its procedures for document and records management and its ASI CoC Manual. This procedure and the CoC Manual describe the Material Accounting System (software and tools used) and its relevant records filing system.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity reports information to the ASI Secretariat regarding the Input and Output Quantities of CoC Material/s over the calendar year, most recently in June 2025, for the 2024 calendar year.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity reports information to the ASI Secretariat regarding the Input and Output Quantities of Eligible Scrap over the calendar year, most recently in June 2025, for the 2024 calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity reports information to the ASI Secretariat regarding the Inflows and Outflows Quantities of Non-CoC Material/s over the calendar year, most recently in June 2025, for the 2024 calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity reports information to the ASI Secretariat regarding the Positive Balance carried over to the subsequent Material Accounting Period at the end the calendar year, most recently in June 2025, for the 2024 calendar year.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity reports information to the ASI Secretariat regarding the Positive Balance used over the calendar year, most recently in June 2025, for the 2024 calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has reported information on Internal Overdraw to the ASI Secretariat according to the ASI schedule.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity reports information to the ASI Secretariat regarding the Quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity Flows) over the calendar year, most recently in June 2025, for the 2024 calendar year.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
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 use Outsourcing Contractors for further processing, treatment or manufacturing.
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 use Outsourcing Contractors for further processing, treatment or manufacturing.

CRITERION	RATING	COMMENT
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as it does not use Outsourcing Contractors for further processing, treatment or manufacturing.
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Conformance	The Entity's Bauxite Mining unit (European Bauxites S.A.) is ASI Performance Standard Certified and within the Entity's Chain of Custody Certification Scope. European Bauxites S.A. transfers all production to the Aluminium of Greece Plant without mixing with Non-CoC Material. The entire Bauxite quantity produced by the Entity's mining unit is therefore considered Certified ASI Bauxite.
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity's Bauxite Mining units (European Bauxites S.A.) are ASI Performance Standard Certified and within the Entity's CoC Certification Scope. European Bauxites S.A. transfers all its production to the Aluminium of Greece Plant, without mixing it with Non-CoC Material. The entire Bauxite quantity produced by the Entity's mining unit is therefore considered ASI Certified Bauxite.
3.1c ASI Bauxite (Bauxite sourcing)	Conformance	The entire Bauxite quantity produced by the Entity's mining unit is considered ASI Certified Bauxite, and therefore, no CoC Documents are issued, as it is considered an internal transfer of Bauxite. The relevant quantities are attributed within the Entity's Material Accounting System.
3.2a ASI Alumina (CoC Certification Scope)	Conformance	The Entity's Alumina Refining occurs at the Aluminium of Greece plant, which is included in the Entity's CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity's Alumina is produced at the Aluminium of Greece plant, which is included in its ASI Performance Standard Certification Scope. Further information is available at: https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A- and; https://aluminium-stewardship.org/wp-content/uploads/2024/08/ASI-Audit-Report-Metlen-Energy-Metals-S.A.-Certificate-156-PS-Rev-2.pdf
3.2c ASI Alumina (Bauxite sourcing)	Conformance	The entire Bauxite quantity produced by the Entity's mining unit is considered ASI Certified Bauxite, and therefore, no CoC Documents are issued, as it is considered an internal transfer of Bauxite. The relevant quantities are attributed within the Entity's Material Accounting System.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Aluminium is produced at its electrolysis facilities at the Aluminium of Greece Plant, which is included in the Entity's ASI CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity's electrolysis facilities are located within the Aluminium of Greece Plant, which is ASI Performance Standard Certified. Further information is available at: https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A- and;

CRITERION	RATING	COMMENT
		https://aluminium-stewardship.org/wp-content/uploads/2024/08/ASI-Audit-Report-Metlen-Energy-Metals-S.A.-Certificate-156-PS-Rev-2.pdf
3.3c ASI Aluminium (Alumina sourcing)	Conformance	All the Entity's ASI Alumina is produced at the Entity's Aluminium of Greece Plant, which is included in the Entity's ASI Performance Standard Certification Scope and CoC Certification Scope: https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A-
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	Pre-Consumer and Post-Consumer Scrap inputs are designated as ASI Eligible Input in the Entity's Aluminium of Greece Plant, which is included in the Entity's CoC Certification Scope. The Entity has robust processes in place to monitor the quantities of Recycled Aluminium and designated Eligible Inputs and Non-CoC Materials in the Material Accounting System.
4.1b Recycled Aluminium (Performance Standard)	Conformance	Pre-Consumer, Post-Consumer and internal Scrap are used by the Entity as input to the Aluminium production process, which is ASI Performance Standard Certified: https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A- The Entity is not engaged however in Aluminium Re-melting/Refining activities to produce Recycled Aluminium at the Aluminium of Greece Plant, as Scrap is directly mixed with Primary Aluminium into the furnace.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has implemented a procedure that describes the categories of Scrap and its classification. The Entity uses a mix of Pre-Consumer Scrap, Post-Consumer Scrap and RSIs (Recycled Scrap) made from treated Dross and Post-Consumer Scrap. After classification, the Scrap is assessed for eligibility. The incoming material is accounted for in the Material Accounting System.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity uses a mix of Pre-Consumer Scrap, Post-Consumer Scrap and RSIs (Recycled Scrap) made from treated Dross and Post-Consumer Scrap. The Entity has implemented Due Diligence and risk evaluation procedures to screen its critical suppliers and to conduct risk assessments according to specific criteria. The Entity has recently assessed all its Scrap suppliers and documented these results.
4.2c Eligible Scrap (Dross)	Conformance	The Entity has implemented a procedure that describes the categories of Scrap and its classification. The Entity uses a mix of Pre-Consumer and Post-Consumer Scrap that contains Dross and treated Dross as Input. After this classification, the Certification Status of Materials is checked for eligibility. The incoming material is accounted for in the Material Accounting System.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established procedures to record the identity, place of operation, and principles of all direct suppliers of Recyclable Scrap Material. The Entity screens, monitors, and periodically evaluates all direct suppliers of Recyclable Scrap Material. There are detailed records for every supplier of Recyclable Scrap Material.

CRITERION	RATING	COMMENT
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity does not conduct cash transactions with its suppliers. In any case, all transactions (including cash) are attributed within the Entity's Material Accounting System.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Scrap at its Casthouse in the Aluminium of Greece Plant, which is included in the Entity's CoC Certification Scope. Further information is available at: https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/our-facilities/aluminium/
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse Products are produced at its Casthouse in the Aluminium of Greece Plant, which is included in the Entity's ASI Performance Standard Certification Scope. https://aluminium-stewardship.org/about-asi/members/Metlen-Energy---Metals-S-A
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has implemented systems to ensure that ASI Aluminium is produced only from Casthouses that are within its ASI Performance Standard Certification Scope and sourcing Aluminium directly from Aluminium of Greece plant. No ASI Aluminium however has been produced or sold to date (i.e. 2022-2025).
5.2 Unique Identification	Conformance	The Entity's Casthouse has implemented a 'hard-marking' system to ensure that unique identification numbers appear on Products (e.g., slabs and columns). This information is linked to the Material Accounting System. A printed tag is included with each package and the information on the tag is described in the related Casthouses procedures.
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 established a Suppliers & Business Partners Code of Conduct and a Responsible Supply Chain Policy, which address environmental, social, and governance issues. Both documents are available at: https://www.metlen.com/sustainability/our-main-policies/

CRITERION	RATING	COMMENT
		The Entity has also established a Code of Business Conduct, which includes the relevant anti-Corruption activities and obligations of the employees, and a Suppliers/Business Partners Code of Conduct, which includes anti-Corruption and anti-Bribery requirements for suppliers and contractors. The Entity's ethical risk assessment is dynamically updated according to the information received by established ethics reporting channels and other communication tools. The Entity has provided training to employees on business ethics and anti-Corruption. An external Chartered Accountant annually audits the Entity's financial system.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has established a Suppliers & Business Partners Code of Conduct and a Responsible Supply Chain Policy, which address environmental, social, and governance issues. Both documents are available at: https://www.metlen.com/sustainability/our-main-policies/ The Suppliers/Business Partners Code of Conduct and the Responsible Supply Chain Policy are well communicated to suppliers of Non-CoC Material, Recyclable Scrap Material and CoC Material.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has established a Suppliers & Business Partners Code of Conduct and a Responsible Supply Chain Policy, which address Human Rights issues. Both documents are available at: https://www.metlen.com/sustainability/our-main-policies/ The Entity's Code of Business Conduct (2019) includes Respect for Human Rights (Clause 5.17) and is available at: https://www.metlen.com/media/doil4yvc/kodikas_epaggelmatikis_deontologias_en.pdf The Entity has established a Human Rights Policy, available at: https://www.metlen.com/media/rp3edd3u/politiki_anthrwpinwn_dikaiwmatwn_en.pdf
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has implemented a Suppliers & Business Partners Code of Conduct which includes commitments to avoid direct or indirect involvement in armed conflicts according to the OECD Guidance. The Suppliers' Code of Conduct is available at: https://www.metlen.com/sustainability/our-main-policies/ The Entity has implemented a process to ensure that the main raw materials (Bauxite and Aluminium Scrap) do not originate from Conflict-Affected and High-Risk Areas (CAHRAs). All current or potential suppliers are systematically screened by the Entity's Due Diligence system in accordance with the OECD Due Diligence Guidance. The Entity's assessment did not identify any significant actual or potential risks and no critical suppliers provide Bauxite or other critical raw materials sourced from CAHRAs.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has demonstrated it periodically evaluates its suppliers by using appropriate online tools, which allows new business partners (customers and suppliers) to be audited. The latest risk assessments of Bauxite and Scrap suppliers are documented in appropriate records according to established procedures. These risk assessments have not identified any adverse impacts that require measurable risk mitigation.

CRITERION	RATING	COMMENT
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a Complaints Mechanism and internal compliance processes. Interested parties can communicate with the Entity at: https://www.metlengroup.com/contact-us/ The Entity's Requests and Complaints Form is available at: https://www.metlengroup.com/what-we-do/metallurgy-sector/aluminium-of-greece/requests-complaints-form/ or by email at: compliance@metlengroup.com A Complaints Platform is also available at: https://metlen.ethics.help/web/en
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System based on Oracle Applications that are used during the production process. A CoC Manual fully describes the use of the System. The Entity's CoC internal control system described the material flow, from the Bauxite mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat.
8.2 Material Accounting Period	Conformance	The Entity has defined its Material Accounting Period as 1 January to 31 December, a 12 month calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a Material Accounting System based on Oracle Applications for the production process and has implemented a CoC Manual that describes the use of the System. The CoC internal control system describes the material flow, from the Bauxite Mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a Material Accounting System based on Oracle Applications for the production process and has implemented a manual that describes the use of the System. The CoC internal control system describes the material flow, from the Bauxite Mines to the Casthouses, via the Refinery and Smelter. The full functionality of the Material Accounting System was confirmed and the quantities agreed with the report submitted to the ASI Secretariat.
8.5 Indivisibility of CoC Material	Conformance	The Entity has designated its Output Quantity of CoC Material as 100%. The Material Accounting System is designed to automatically calculate the Output percentage. This Output percentage is compared with the Input Percentage to ensure that it does not exceed this value.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable as the Entity recycles its internal Scrap back into the system.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that Outputs do not exceed Inputs, which is reviewed monthly. The Entity determines the total Output of CoC Material, based on CoC Material Inputs, conversion factors, and Eligible Scrap.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Not Applicable	This Criterion is not applicable as the Entity does not intend to carry over an Internal Overdraw to the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that a Positive Balance is carried over to the subsequent Material Accounting Period.
8.9b Positive Balance (Expiry)	Conformance	The Entity has established a Material Accounting System and internal control mechanisms to ensure that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down.
9. ISSUING COC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has implemented a procedure to ensure that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity ensures that CoC information is included in the invoice accompanying each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's CoC Document template includes the date of issue which is the same as the shipping documentation.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's CoC Document template includes the reference number, which is the same as the shipping documentation number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Document template includes, by default, the Entity's identity, address, and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's CoC Document template includes, by default, the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number is included in the CoC Document.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's CoC Document template includes, by default, the responsible employee who can verify information in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's CoC Document template includes, by default, the required statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."

CRITERION	RATING	COMMENT
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's CoC Document template includes, by default, the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's CoC Document template includes, by default, the mass of CoC Material of the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's CoC Document template includes, by default, the Mass of total Material of the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable as Entity does not intend to report data on the average carbon footprint of the CoC Material and accounting method applied.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable as Entity does not intend to report information to support 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	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Supplementary Information in CoC Documents.
9.5 Verification of Information	Conformance	The Entity has designated the Sales Department personnel responsible for the management of CoC requests from customers aligned to the Entity's Quality Management System. In any case of CoC-related issues, the ASI CoC Representative is informed and takes appropriate decisions for Corrective Actions if needed. The relevant personnel were trained on their duties under the ASI Chain of Custody Standard. The system is robust to document errors, Corrective Actions, and any potential preventive measures according to the existing procedures.
9.6 Error (Shipping)	Conformance	The Entity has implemented an error management process as part of its Quality Management System. The Entity's ASI team identifies non-conformities, and regularly monitors root causes and Corrective Actions.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has established a Management System procedure and actions to regularly check and verify CoC Documents received from other Certified Entities.

CRITERION	RATING	COMMENT
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established procedures and controls to regularly check the consistency of the CoC Documents before recording information in the Oracle-based Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established a Management System procedure to regularly check the ASI website to verify the validity and scope of its suppliers' ASI Certification.
10.4 Error (Reception)	Conformance	The Entity has established an error management process as part of its Quality Management System. Identified non-conformities, root causes, and Corrective Actions are monitored regularly by the Entity's ASI team.
11 CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has integrated the ASI Claims Guide requirements into its internal procedures and communication mechanisms. No claims have taken place to date relating to CoC Material.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has integrated the ASI Claims Guide requirements into its internal procedures and communication mechanisms. No claims have taken place to date relating to CoC Material.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has trained relevant personnel on their duties regarding ASI claims and representation.

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 October 2022	Initial Certification Audit – Full Certification
1	2 August 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI CoC V2. Updated to reflect change of Member and Entity Name – from Mytilineos S.A. Metallurgy Business Unit to Metlen Energy & Metals S.A.
2	30 July 2026	Surveillance Audit – Name change of 'Delfi-Distomon' Facility to 'European Bauxites'.