

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Maaden Aluminium

CERTIFICATE NUMBER

142

ASI STANDARD

CHAIN OF CUSTODY
STANDARD
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

14 JULY 2024

DATE OF EXPIRY

13 JULY 2027

CERTIFIED SINCE

14 JULY 2021

AUTHORISED BY

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

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

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Maaden Aluminium includes
Bauxite mining at the Al Ba'itha
Mine (Al-Qassim City, Saudi Arabia)
and the operations at the Ras al-
Khair plant (Ras Al-Khair Industrial
City, Saudi Arabia) for Alumina
Refining/smeltering, Aluminium Re-
melting, Casthouses producing
ingots, billets and slabs and
manufacturing of flat rolled
products.

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Maaden Aluminium
ENTITY NAME	Maaden Aluminium
CERTIFICATION SCOPE	Maaden Aluminium includes Bauxite mining at the Al Ba'itha Mine (Al-Qassim City, Saudi Arabia) and the operations at the Ras Al-Khair plant (Ras Al-Khair Industrial City, Saudi Arabia) for Alumina Refining/smelting, Aluminium Re-melting, Casthouses producing ingots, billets and slabs and manufacturing of flat rolled products.
SUPPLY CHAIN ACTIVITIES	• Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses • Post-Casthouse
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	• Initial Certification Audit (11– 29 April 2021) • Re-Certification Audit and Scope Change (17 – 20 July 2024) • Surveillance Audit (21 – 25 June 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 11– 29 April 2021 (Initial Certification Audit) • 17 – 20 July 2024 (Re-Certification Audit and Scope Change) • 21 – 25 June 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 18 June 2021 (Initial Certification Audit) • 27 June 2024 (Re-Certification Audit and Scope Change) • 8 July 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (11– 29 April 2021)</u> The Audit Scope includes all activities at the Al Ba'itha Mine as well as operations at Ras Al-Khair industrial city, Saudi Arabia, including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs, and re-melting & manufacturing of flat rolled Products. The Audit also included processes performed from Head Office. Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining

- Casthouses
- Post-Casthouse

All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

At the time of the Audit (April 2021), access to the site at Al Ba'itha mine was limited, due to COVID-19 related travel restrictions, however all facilities at the Ras al-Khair industrial city were audited on-site. Therefore, the audit can be considered as a combined desktop and on-site exercise, in accordance with ASI Interim Policy.

Re-Certification Audit and Scope Change (17 – 20 July 2024)

The Audit Scope includes all activities at the Al Ba'itha Mine as well as operations at Ras Al-Khair industrial city, Saudi Arabia, including Alumina Refining and smelting as well as Casthouses producing ingots, billets and slabs, and re-melting and manufacturing of flat rolled Products. The Audit also included processes performed from Head Office.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

Surveillance Audit (21 – 25 June 2025)

The Audit Scope included all activities and facilities within Maaden Aluminium, Al Ba'itha and Ras Al-Khair Bauxite mines, Alumina Refinery, Aluminium Smelting, Aluminium re-melting/refining, Casthouse producing ingots, billets, and slab, and semi-fabrication of flat rolled products.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance 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	14 July 2024 – 13 July 2027

NEXT AUDIT TYPE	Re-Certification Audit
-----------------	------------------------

NEXT AUDIT DUE DATE	13 July 2027
---------------------	--------------

CERTIFICATE NUMBER	142
--------------------	-----



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

Maaden Aluminium Company (MAC) (the 'Entity') has developed one of the largest integrated Mining and Aluminium processing complexes in the world. The Mine is located at Al Ba'itha in the North-eastern of Saudi Arabia and the Aluminium processing Facility is located at Ras Al-Khair, North of Jubail. The integrated complex at Ras Al-Khair consists of an Alumina Refinery, Aluminium Smelter and rolling mills. The Bauxite is sourced from the Al Ba'itha mine, which includes ore crushing and handling Facilities. The mine produces approximately four million tonnes of Bauxite annually which is transported via the new North-South railway line to Ras Al-Khair.

The Entity's Refinery processes Bauxite from the Al Ba'itha Mine site continuously and produces Smelter-Grade Alumina (SGA) at an average base case rate of 1.8 – 2.0 million tonnes per annum (Mtpa).

The Entity's Smelter includes a reduction (Electrolysis) process and a carbon plant. The main purpose of the Carbon Plant is to manufacture pre-baked anodes. The Smelter is an AP37 electrolysis process utilising Aluminium Pechiney (AP 3X) technology and designed to operate up to 370kA. It consists of two potlines with a total of 720 Reduction Cells (Pots) with a capacity of 738,000 tonnes of Liquid Metal.

The Casthouse contains fifteen holding furnaces, three Billets, five Ingots, five Slabs and two re-melt furnaces. All the holding furnaces are operated by natural gas as a combustion system. The rolling mill is located adjacent to the Smelter and is designed to produce Flat Rolled Products (FRP). The project's intended annual total capacity is to commence at around 380 kt. The Facility includes a Can Reclamation Unit, a hot rolling line, a cold rolling line, and a finishing line.

MATURITY RATINGS

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

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

OVERALL	
SYSTEMS	Medium
RISKS	High
PERFORMANCE	High
OVERALL	HIGH

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity has been a Member of the Aluminium Stewardship Initiative (ASI) since February 2020 in the Production and Transformation category.
1.2 CoC Management System	Conformance	The Entity has established a Product Stewardship Chain of Custody (CoC) Management System, including material accounting and documentation, which adequately addresses all applicable requirements of the ASI Chain of Custody Standard and covers Facilities within the CoC Certification Scope that take custody of CoC Material.
1.3 CoC Management System Monitoring	Conformance	The Entity's CoC Management System has been implemented, and the annual management review has been conducted, resulting in the current version of the CoC Management System.
1.4 Management Representative	Conformance	The Entity has appointed the Central Environment Manager as the Management Representative, with overall responsibility and authority for ensuring 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 a training module on ASI CoC requirements and has conducted training for relevant employees to ensure they are aware of, and competent in, their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity has documented the Material Accounting Procedure (MSHEM-16), wherein, under Table 7, the retention requirement for CoC records is specified as permanent.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year regarding the Inputs and Outputs of CoC Material. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. This Audit confirmed that the reporting for the 2025 calendar year was submitted to ASI before 30 June 2026.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. The Entity provides further information on the breakdown of Eligible Scrap into Post-Consumer Scrap and Pre-Consumer Scrap, which is designated as CoC Material supplied directly from a CoC-Certified Entity within the calendar year.
1.7c Reporting to ASI (Inflows and Outflows of	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting

CRITERION	RATING	COMMENT
Non-CoC Material)		Dashboard. The Entity's mass balance data includes Inflows and Outflows of non-CoC Material.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. The Entity's mass balance data include any Positive Balance that is carried over to the subsequent Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. The Entity's mass balance data include any Positive Balance used in the Material Accounting Period.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. The Entity's reporting includes data on Internal Overdraw, if any.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has specified in its CoC Material Accounting Procedure the requirement to report to ASI before 30 June for the previous year. The Entity obtains the data reported to ASI from its Material Accounting Dashboard. The Entity's reporting includes data on Intra-Entity Flows.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material for further processing, treatment or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material for further processing, treatment or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material for further processing, treatment or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material for further processing, treatment or manufacturing.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material 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 as the Entity does not have any Outsourcing Contractors that take custody of CoC Material for further processing, treatment or manufacturing.

CRITERION	RATING	COMMENT
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable as the Entity does not have any Outsourcing Contractors that take custody of CoC Material 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 produces ASI Bauxite from its own Bauxite mine located in Al Ba'itha, which is within the Entity's CoC Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity produces ASI Bauxite from its own bauxite mine located in Al- Ba'itha, which is within the Entity's ASI Performance Standard Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it solely sources Bauxite from its own mines.
3.2a ASI Alumina (CoC Certification Scope)	Conformance	The Entity produces ASI Alumina at its refinery, which is included within its CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity produces ASI Alumina from its own refinery, which is included within the Entity's ASI Performance Standard Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it solely sources Bauxite from its own mines.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Aluminium in its own smelter, which is included within its CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Aluminium at its own smelter, which is included within the Entity's ASI Performance Standard Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it solely sources Alumina from its own refinery.

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity remelts Aluminium in the can recycling unit, which is located within the rolling mill and is included in its CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity remelts Aluminium in the can recycling unit, which is located within the rolling mill and is included in its ASI Performance Standard Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has established provisions within its Material Accounting System to accept both Eligible and non-Eligible Scrap for the re-melting process. All non-ASI Scrap has been duly accounted for. The system also classifies Pre-Consumer Scrap returned by customers as Eligible Scrap, as the material was originally supplied by the Entity and the Scrap supplier has undergone appropriate Due Diligence.
4.2b Eligible Scrap (Post-	Conformance	The Entity receives Post-Consumer Scrap in the form of used

CRITERION	RATING	COMMENT
Consumer)		beverage cans from various Scrap suppliers globally, all of whom are subject to Due Diligence assessment. The Material Accounting System developed by the Entity classifies Eligible Scrap as Post-Consumer Scrap received from suppliers that have successfully undergone an appropriate Due Diligence assessment.
4.2c Eligible Scrap (Dross)	Conformance	While the Entity has established provisions in the Material Accounting System for the Input of ASI Pre-Consumer Scrap and non-ASI Pre-Consumer Scrap (including Dross), it was observed that the system has only received internal Scrap, which is ASI CoC certified.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has established a system to record the identity and place(s) of operation of all direct suppliers of recyclable Scrap material. The information is collected through a questionnaire and recorded in the Entity's supplier database.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity records all financial transactions with its direct suppliers of recyclable Scrap material in its financial accounting system. The Entity does not facilitate cash payments to suppliers, as all payments are processed through bank transfers.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces ASI Casthouse Products in its own Casthouse, which is included within its CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity produces ASI Casthouse Products in its own Casthouse, which is included within its ASI Performance Standard Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it solely sources ASI Aluminium from its own Casthouse.
5.2 Unique Identification	Conformance	The Entity has established and implemented a system for the identification of its Casthouse Products using a unique identification number that includes the year of production. This number is either physically stamped on the Products or indicated on labels affixed to ingot bundles. The identification number enables traceability to the Input Quantity of CoC material for the relevant Material Accounting Period.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity produces post-Casthouse products (e.g., can body stock coils and auto sheet coils) at its rolling mill facility, which is included within its CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity produces post-Casthouse products (e.g., can body stock coils and auto sheet coils) at its own rolling mill facility, which is included within its ASI Performance Standard Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's rolling mill produces Aluminium coils, primarily from Aluminium sourced from its own Casthouse, which is included within its CoC Certification Scope. The Entity has established provisions to classify any ingot slabs purchased from non-ASI Certified Facilities as

CRITERION	RATING	COMMENT
		non-ASI Aluminium within its Material Accounting System/dashboard. To date, the Entity has sourced Aluminium slabs from only one external supplier, that is currently certified under both the ASI Performance Standard and the Chain of Custody Standard.
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 Supplier Code of Conduct that addresses anti-Corruption. This Code of Conduct is communicated to suppliers of CoC Material, non-CoC Material and recyclable Scrap, that are required to confirm their acceptance. The Entity has also implemented a Due Diligence questionnaire for its non-CoC metal and Scrap suppliers, which includes provisions on Anti-Corruption training. The Supplier Code of Conduct is available at: https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/suppliers-code-conduct-ethics.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity's Supplier Code of Conduct addresses environmental, social, and governance factors. This Code is communicated to and accepted by suppliers of CoC Material, Non-CoC Material and recyclable Scrap. Recently, the Entity adopted a Responsible Sourcing Management System, which aligns with the LME Responsible Sourcing requirements. The Supplier Code of Conduct is available at: https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/suppliers-code-conduct-ethics.pdf
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has documented its Supplier Code of Conduct, which covers Human Rights Due Diligence. The Supplier Code of Conduct has been communicated to, and accepted by suppliers of CoC Material, non-CoC Material and recyclable Scrap. The Entity has also implemented a CoC Due Diligence questionnaire for these suppliers. The Supplier Code of Conduct is available at: https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/suppliers-code-conduct-ethics.pdf The Entity has recently strengthened its Responsible Sourcing and Social Management System in alignment with SA8000 (Social Accountability International), which covers all major Criteria related to Human Rights Due Diligence. To date, no cases have been identified in which violations of Human Rights requiring remediation have occurred.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity does not operate in, nor source material from, Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has developed a comprehensive, fit-for-purpose management framework for responsible sourcing that aligns with international good practices and enables the implementation of risk-based Due Diligence throughout its supply chain. The risk factors considered include sanctions risk, state ownership risk, Politically Exposed Persons (PEP) risk, enforcement and fines risk, and liquidity risk. With the support of an external consultant specialising in responsible supply chain development, the Entity has completed initial

CRITERION	RATING	COMMENT
		data gathering through supply chain mapping, materiality assessment, and risk analysis, and has identified key risk areas within its supply chain. The assessment is based on key risks identified by the Entity, as well as OECD guidelines, ASI Performance Standard V3, and other relevant industry initiatives and standards.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has developed a CoC Due Diligence questionnaire for its suppliers of Non-CoC material and recyclable Scrap material, which includes provisions for documenting the risk of non-compliance with its Responsible Sourcing Policy, as well as corresponding mitigation actions. The Entity has completed initial data gathering through supply chain mapping, materiality assessment, and risk analysis, and has identified key risk areas within its supply chain. Based on the outcomes of this process, the Entity has developed and implemented a management procedure to effectively respond to the identified risks.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a Whistleblowing Policy for its Stakeholders, appropriate to the nature and scale of its business. Under this policy, any Stakeholder within the Aluminium supply chain can raise complaints regarding non-compliance with the Entity's Responsible Sourcing Policy. The 'whistleblowing' mechanism is accessible via the Entity's website and includes both a toll-free number and a dedicated email address for submitting complaints: https://secure.ethicspoint.eu/domain/media/en/gui/104569/index.html
8. MATERIAL ACCOUNTING SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has developed and implemented a Material Accounting System that captures data related to the Input and Output Quantities of CoC Material and Non-CoC Material on a mass balance basis. The System reflects material movement from the Bauxite mine to the refinery, from the refinery to the smelter, from the smelter to the casthouse, and from the casthouse to the rolling mill. The comprehensive Material Accounting System that is implemented ensures and safeguards the integrity of CoC Material and Eligible Scrap Mass Balance within the defined Certification Scope.
8.2 Material Accounting Period	Conformance	The Entity has defined the calendar year as the Material Accounting Period for CoC material accounting, as specified in the Chain of Custody Material Accounting and Documentation Procedure. This is also reflected in the Entity's material accounting records.
8.3 Input and Inflow Quantities	Conformance	The Entity has developed a Material Accounting System that captures data related to the Input and Output Quantities of CoC Material and Non-CoC Material on a mass basis. The system reflects the movement of materials from the bauxite mine to the refinery, from the refinery to the smelter, from the smelter to the casthouse, and from the casthouse to the rolling mill. The Entity's Material Accounting System applies the Input percentage applied to the total Input of CoC Material and/or Eligible Scrap over the Material Accounting Period to calculate the total Output of CoC Material and/or Eligible Scrap.

CRITERION	RATING	COMMENT
8.4 Output Quantities of CoC Material	Conformance	The Entity has developed a Material Accounting System that captures data related to the Input and Output Quantities of CoC Material and Non-CoC Material on a mass basis. The system reflects the movement of materials from the Bauxite mine to the refinery, from the refinery to the smelter, from the smelter to the casthouse, and from the casthouse to the rolling mill. The Entity's Material Accounting System applies the Input percentage applied to the total Input of CoC Material and/or Eligible Scrap over the Material Accounting Period to calculate the total Output of CoC Material and/or Eligible Scrap.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Material Accounting System designates the Output Quantity of CoC Material as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity does not send Scrap generated in the Rolling Mill to any external CoC Facility. The Scrap is processed internally at its own casthouse, and the Material Accounting System classifies the output quantity of this Scrap as Eligible Scrap based on the input percentage.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System applies the same percentage to calculate the total Output of CoC Material and/or Eligible Scrap as the Input percentage applied to the total Input of CoC Material and/or Eligible Scrap over the Material Accounting Period.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure stipulates that any Internal Overdraw shall not exceed 20% of the total Input Quantity of CoC Material over the Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure specifies that Internal Overdraw shall not exceed the amount of CoC Material impacted by the Force Majeure event.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure, supported by the ASI Material Accounting Dashboard, ensures that any Internal Overdraw is fully made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure requires that any Positive Balance carried over at the end of a Material Accounting Period is clearly identified and documented.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Chain of Custody Material Accounting and Documentation Procedure stipulates that any Positive Balance generated in one Material Accounting Period and carried forward to the subsequent period shall expire at the end of that period if it is not utilised.
9. ISSUING COC DOCUMENTS		
9.1 CoC Document	Conformance	The Entity has defined, within its Chain of Custody Material Accounting and Documentation Procedure, the requirement for a CoC Document to accompany each shipment or transfer of CoC Material dispatched to other CoC-Certified Entities. A standard format for the CoC Document is used, and the requirements have been communicated to the relevant personnel.

CRITERION	RATING	COMMENT
9.2a CoC Document Content (Date of issue)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes the date of issuance.
9.2b CoC Document Content (Reference number)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes a reference number for each Document, which is linked to the Entity's Material Accounting System for verification purposes.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes the name, address, and Certificate number of the issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes the name, address, and CoC Certificate number of the customer receiving the CoC Material.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes the name of the responsible employee of the Entity who verifies the information contained in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes a statement confirming that the information provided in the CoC Document is in conformance with the ASI Chain of Custody Standard.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity facilitates CoC transactions through a CoC Document that specifies the type of CoC Material included in the shipment. The Material types include ASI Bauxite, ASI Alumina, ASI Liquid Metal and ASI Cold Metal.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes information on the mass of the CoC Material and the corresponding unit of measurement.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity facilitates CoC transactions through a CoC Document that includes information on the total mass of the material and the corresponding unit of measurement.
9.3a Sustainability Data (optional) – Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity as it has chosen not to provide Supplementary Information.
9.3b Sustainability Data (optional) – Origin information	Not Applicable	This Criterion is not applicable to the Entity as it has chosen not to provide Supplementary Information.
9.3c Sustainability Data (optional) – Recycled content	Not Applicable	This Criterion is not applicable to the Entity as it has chosen not to provide Supplementary Information.
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Conformance	The Entity facilitates CoC transactions through a CoC Document for its rolling mill CoC material that includes the ASI Performance Standard Certification status.

CRITERION	RATING	COMMENT
9.4 Supplementary Information (optional) – Objective evidence	Not Applicable	This Criterion is not applicable to the Entity, as it has chosen not to provide Supplementary Information.
9.5 Verification of Information	Conformance	The Entity maintains open channels for all interested Stakeholders to verify specific aspects of its operations, including all transactions related to CoC materials and products. Relevant contact information is available at: https://www.maden.com.sa/en/contacts/address
9.6 Error (Shipping)	Conformance	The Entity has established an integrated Quality Assurance (QA) Manual that addresses the requirement to document corrective actions for all non-conformances within its Quality Management System. The Central Environment Team, in coordination with personnel from the casthouse and rolling mill departments, is responsible for managing non-conformances or errors in CoC Documents in accordance with defined procedures for correction and prevention, consistent with practices applied across other operational areas.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity's personnel have been trained to verify information contained in CoC Documents received from other certified CoC Entities, in accordance with the roles and responsibilities defined in the Entity's Product Stewardship and CoC Material Accounting Documentation Procedure.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity's personnel have been trained to verify information contained in CoC documents received from other certified CoC Entities, in accordance with the responsibilities defined in the Entity's Product Stewardship and CoC Material Accounting Documentation Procedure.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity does not currently receive material from CoC-Certified facilities; therefore, verification of the validity and scope of suppliers' ASI CoC Certification via the ASI website is not presently required. Personnel have been trained on the requirements of the ASI Chain of Custody Standard, including the verification of supplier CoC Certification status, when applicable.
10.4 Error (Reception)	Conformance	Through the Product Stewardship and CoC Material Accounting Documentation Procedure, the Entity has established a system to ensure consistent verification of CoC documents for all transactions. The Integrated Quality Manual emphasises error prevention; however, where recording errors are identified, corrective actions are implemented by all relevant parties to address the issue, and preventive measures are established to avoid recurrence.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity ensures compliance with the requirements of the ASI Claims Guide, provides verifiable evidence to support all ASI claims and representations, and delivers adequate training to employees who are directly or indirectly involved in understanding and communicating such claims and representations.

CRITERION	RATING	COMMENT
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity ensures compliance with the requirements of the ASI Claims Guide, provides verifiable evidence to support all ASI claims and representations, and delivers adequate training to employees who are directly or indirectly involved in understanding and communicating such claims and representations.
11.1c Claims and Communications (Employee training)	Conformance	The Entity ensures compliance with the ASI Claims Guide, provides verifiable evidence to support all ASI claims and representations, and delivers adequate training to employees involved in understanding and communicating such claims and representations.

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	12 July 2021	Initial Certification Audit – Full Certification
1	31 July 2024	Re-Certification Audit and Scope Change from V1 to V2 of the ASI Chain of Custody Standard.
2	10 September 2026	Surveillance Audit – name change of Entity from 'Ma'aden Aluminium' to 'Maden Aluminium'.