

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

## CROWN EMBALAGENS METÁLICAS DA AMAZÔNIA S/A - CROWN BEVERAGE CAN BRAZIL DIVISION

CERTIFICATE  
NUMBER

197

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

25 MARCH 2022

DATE OF EXPIRY

31 MAY 2028

CERTIFIED SINCE

25 MARCH 2022

AUTHORISED BY

A stylized, handwritten signature in white ink, consisting of a large, flowing 'A' followed by a horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)

CERTIFICATION SCOPE

The Crown Beverage Brazil Division including Can Plants at Cabreúva, São Paulo; Estancia, Sergipe; Ponta Grossa, Parana; Rio Verde, Goias; Teresina, Piaui; the Can End Plant at Manaus, Amazonas and the Corporate Office at Cabreúva, São Paulo (Brazil).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MEMBER NAME             | Crown Holdings, Inc                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ENTITY NAME             | Crown Embalagens da Amazonia - Crown Beverage Brazil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| CERTIFICATION SCOPE     | The Crown Beverage Brazil Division including Can Plants at Cabreúva, São Paulo; Estancia, Sergipe; Ponta Grossa, Parana; Rio Verde, Goias; Teresina, Piaui; the Can End Plant at Manaus, Amazonas and the Corporate Office at Cabreúva, São Paulo.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ASI STANDARD            | <ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Initial Certification Audit (21 February – 10 March 2022)</li><li>• Surveillance Audit (28 – 31 August 2023)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| AUDIT DATE              | <ul style="list-style-type: none"><li>• 21 February – 10 March 2022 (Initial Certification Audit)</li><li>• 28 – 31 August 2023 (Surveillance Audit)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>• 12 March 2022 (Initial Certification Audit)</li><li>• 29 September 2023 (Surveillance Audit)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (21 February – 10 March 2022)</u></p> <p>The audit scope covered the activities across the Crown Beverage Brazil Division including the Can Plants at Cabreúva and Ponta Grossa, the Can End Plant at Manaus and the Corporate Office.</p> <p>The ASI multi-site sampling approach was undertaken to include the Can Plants at Estancia, Rio Verde and Teresina.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p><u>Surveillance Audit (28 – 31 August 2023)</u></p> <p>The audit scope covered the activities at Crown Beverage Brazil Division's Can Plants including the management activities at the headquarters and two Beverage Can Bodies Manufacturing Units.</p> |

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The ASI multi-site sampling approach was undertaken. The audited facilities included Cabreúva and Teresina and the headquarters located in Cabreúva.

Supply chain activities included in the audit scope:

- Post-Casthouse

All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

25 March 2022 – 31 May 2028

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

31 May 2028

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CERTIFICATION  
NUMBER

197

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## SUMMARY OF FINDINGS

| CRITERION                                  | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 MANAGEMENT SYSTEM AND RESPONSIBILITIES   |             |                                                                                                                                                                                                                                                                                                                                                                                                |
| 1.1 ASI membership                         | Conformance | The Entity has been a member of ASI in the Production and Transformation Class since 2020. The Entity is committed to complying with all obligations to ASI membership and the ASI Grievance Mechanism.<br><a href="https://aluminium-stewardship.org/about-asi/asi-members/crown-holdings-inc">https://aluminium-stewardship.org/about-asi/asi-members/crown-holdings-inc</a>                 |
| 1.2 Management system                      | Conformance | The Entity has developed an ASI Manual and has a Management System that meets all applicable requirements of the ASI Chain of Custody Standard and applies to all Facilities under the Entity's Control that have custody of Chain of Custody (CoC) Material.                                                                                                                                  |
| 1.3 Management system reviews              | Conformance | The Entity has developed an ASI Manual and has a Management System that meets all applicable requirements of the ASI Chain of Custody Standard. The ASI Manual is updated periodically and to address areas that may generate potential non-conformance risks. The ASI Manual is periodically reviewed and updated through the ASI Committee which is held every six months.                   |
| 1.4 Management representative              | Conformance | The Entity has appointed the Corporate Quality Manager as the Management Representative who holds responsibility and authority for conformance with all requirements of the ASI Chain of Custody Standard applicable to the Entity, with full support from the ASI Committee, to ensure an integrated view of the organisation, conformance with the criteria and implementation of processes. |
| 1.5 Training                               | Conformance | The Entity has implemented communication and training measures for all who are involved with the ASI Chain of Custody Standard, using different tools to promote communication, training, and awareness among relevant employees.                                                                                                                                                              |
| 1.6 Record keeping                         | Conformance | The Entity has defined in the ASI Manual that all documents related to the ASI Chain of Custody Standard must be retained for a minimum of five years.                                                                                                                                                                                                                                         |
| 1.7a Reporting to ASI (Inputs and Outputs) | Conformance | The Entity has defined in the ASI Manual, the method to provide the Input and Output quantity of CoC Materials during the calendar year, reporting the information to the ASI Secretariat within three                                                                                                                                                                                         |

| CRITERION                                              | RATING         | COMMENT                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                        |                | months after each calendar year. The ASI Materials Consumption Report was sent and reported to the ElementAL Platform on 21 March 2023, referring to consumption for the year 2022.                                                                                                                            |
| 1.7b Reporting to ASI (Input Percentage)               | Conformance    | The Entity has defined in the ASI Manual, the method to provide the incoming quantity of CoC Materials during the calendar year, reporting the information to the ASI Secretariat within three months after each calendar year.                                                                                |
| 1.7c Reporting to ASI (Positive Balance)               | Conformance    | The Entity has defined in the ASI Manual, the method to provide the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period (if applicable) and reporting the information to the ASI Secretariat within three months after each calendar year.                 |
| 1.7d Reporting to ASI (Internal Overdraw)              | Conformance    | The Entity has defined in the ASI Manual, the method for providing the maximum Internal Overdraw within the calendar year (if applicable), and the CoC Material Input Quantity percentage that this represents, reporting the information to the ASI Secretariat within three months after each calendar year. |
| 1.7e Reporting to ASI (Eligible Scrap)                 | Not Applicable | This Criterion is not applicable, as the Entity is not involved in Aluminium Re-melting/Refining activities to produce Recycled Aluminium.                                                                                                                                                                     |
| 1.7f Reporting to ASI (ASI Credits from Casthouses)    | Not Applicable | This Criterion is not applicable, as the Entity is not engaged in producing Casthouse Products and does not use ASI Credits                                                                                                                                                                                    |
| 1.7g Reporting to ASI (ASI Credits purchased)          | Not Applicable | This Criterion is not applicable, as the Entity does not use ASI Credits                                                                                                                                                                                                                                       |
| 2 OUTSOURCING CONTRACTORS                              |                |                                                                                                                                                                                                                                                                                                                |
| 2.1 Outsourcing Contractors in CoC Certification Scope | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material.                                                                                                                                                                                                         |
| 2.2a Control of CoC Material                           | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material.                                                                                                                                                                                                         |
| 2.2b No further outsourcing                            | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material.                                                                                                                                                                                                         |
| 2.2c Risk assessment                                   | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material.                                                                                                                                                                                                         |
| 2.3 Output Quantity                                    | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material.                                                                                                                                                                                                         |

| CRITERION                                                                       | RATING         | COMMENT                                                                                                |
|---------------------------------------------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------|
| 2.4 Verification and record-keeping                                             | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material. |
| 2.5 Error management                                                            | Not Applicable | This Criterion is not applicable, as the Entity does not use Outsourcing Contractors for CoC Material. |
| 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL |                |                                                                                                        |
| 3.1a CoC Certification Scope - Bauxite Mining                                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 3.1b ASI Performance Standard - Bauxite Mining                                  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 3.2a CoC Certification Scope - Alumina Refining                                 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 3.2b ASI Performance Standard - Alumina Refining                                | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 3.3a CoC Certification Scope - Aluminium Smelting                               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 3.3b ASI Performance Standard - Aluminium Smelting                              | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL          |                |                                                                                                        |
| 4.1a CoC Certification Scope - Aluminium Re-Melting/Refining                    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4.1b ASI Performance Standard - Aluminium Re-Melting/Refining                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4.2a Pre-Consumer Scrap and Dross                                               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4.2b Post-Consumer Scrap                                                        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4.3a Supplier records                                                           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 4.3b Cash payments                                                              | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM                                        |                |                                                                                                        |
| 5.1a CoC Certification Scope - Casthouses                                       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |
| 5.1b ASI Performance Standard - Casthouses                                      | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                  |

| CRITERION              | RATING         | COMMENT                                                               |
|------------------------|----------------|-----------------------------------------------------------------------|
| 5.2 Casthouse Products | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

#### 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

|                                                |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.1a CoC Certification Scope - Post-Casthouse  | Conformance | It was evidenced that all of the Entity's operational plants (Brazil), except the Uberaba plant, are part of the Entity's CoC Certification Scope. All plants that are within the scope of CoC Certification, can receive and produce products certified by ASI, as established by the standard.                                                                                                                                                                                                    |
| 6.1b ASI Performance Standard - Post-Casthouse | Conformance | It was evidenced that all of the Entity's operational plants (Brazil), except the Uberaba plant, are part of the Entity's CoC Certification Scope. All plants that are within the scope of CoC Certification, can receive and produce ASI Certified Products, as established by the standard. The Entity is working towards its entire supply chain being certified to the ASI Performance Standard and ASI Chain of Custody Standard so it can purchase ASI Aluminium from ASI Certified Entities. |
| 6.1c Sourcing ASI Aluminium                    | Conformance | It was evidenced that all of the Entity's operational plants (Brazil), except the Uberaba plant, are part of the Entity's CoC Certification Scope. All plants that are within the scope of CoC Certification, can receive and produce ASI Certified Products, as established by the standard. The Entity is working towards its entire supply chain being certified to the ASI Performance Standard and ASI Chain of Custody Standard so it can purchase ASI Aluminium from ASI Certified Entities. |

#### 7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL

|                                                         |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.1a Responsible sourcing policy (anti-corruption)      | Conformance | The Entity has defined an Anti-Corruption practice by requesting suppliers submit and accept the Supplier Code of Conduct during the supplier approval process. The Entity has a Responsible and Ethical Sourcing Policy which references this practice, 'Business Integrity and Anti-Corruption', page 2:<br><a href="https://www.crowncork.com/sites/files/2022-03/code-conduct-brazil_1.pdf">https://www.crowncork.com/sites/files/2022-03/code-conduct-brazil_1.pdf</a> |
| 7.1b Responsible sourcing policy (responsible sourcing) | Conformance | The Entity has defined the practice of communicating the Responsible and Ethical Procurement Policy as part of the supplier approval process.<br><a href="https://www.crowncork.com/sites/files/2022-03/Translate_responsible-ethical-sourcing-policy_2021_PT_BR.pdf">https://www.crowncork.com/sites/files/2022-03/Translate_responsible-ethical-sourcing-policy_2021_PT_BR.pdf</a>                                                                                        |

| CRITERION                                                                | RATING                | COMMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.1c Responsible sourcing policy (human rights due diligence)            | Conformance           | The Entity has defined the practice for the supplier approval process to approach the Human Rights issue by submitting and accepting the Supplier Code of Conduct. The Entity also has implemented a Human Rights Policy, 'Human Rights/Employment Practices/Health and Safety', page 1: <a href="https://www.crowncork.com/sites/files/2022-03/code-conduct-brazil_1.pdf">https://www.crowncork.com/sites/files/2022-03/code-conduct-brazil_1.pdf</a> |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance           | The Entity has defined the practice to avoid the use of conflict minerals in the manufacture of products as part of the supplier approval process by requiring adherence to the Conflict Mineral Policy. <a href="https://www.crowncork.com/investors/policies/conflict-minerals-policy">https://www.crowncork.com/investors/policies/conflict-minerals-policy</a>                                                                                     |
| 7.2 Risk assessment                                                      | Minor Non-Conformance | The Entity assesses the risks of non-compliance with its Responsible Sourcing Policy of suppliers of Non-CoC Materials as part of the supplier approval process, to prevent and mitigate risks for the supply of Materials. However, it was identified that two suppliers did not conduct their risk assessment.                                                                                                                                       |
| 7.3 Complaints mechanism                                                 | Conformance           | The Entity has defined a grievance mechanism that allows all Stakeholders and rightsholders to express concerns about non-conformances with the Responsible Sourcing Policy in the Aluminium supply chain, anonymously via a third party: <a href="https://www.crowncork.com/investors/corporate-governance/toll-free-reporting-line">https://www.crowncork.com/investors/corporate-governance/toll-free-reporting-line</a>                            |
| 8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM                    |                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 8.1 Material Accounting System                                           | Conformance           | The Entity has developed a Material Accounting System for CoC Materials, including spreadsheets and a computerised system, to control and record Input Quantity and Output Quantity and determine the Input and Output volumes in the system.                                                                                                                                                                                                          |
| 8.2a Post-Consumer Scrap                                                 | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                                  |
| 8.2b Pre-Consumer Scrap (total)                                          | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                                  |
| 8.2c Pre-Consumer Scrap (Eligible Scrap)                                 | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                                                                                  |
| 8.3 Material Accounting Period                                           | Conformance           | The Entity has defined within the ASI Manual that the Material Accounting System must specify a Material Accounting Period of 12 months.                                                                                                                                                                                                                                                                                                               |

| CRITERION                                             | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.4 Input Percentage                                  | Conformance    | The Entity has determined the method to calculate and record the Input Percentage for the Material Accounting Period, using the calculation defined in the ASI Chain of Custody Standard.                                                                                                                                                                                                         |
| 8.5 Input Percentage (Aluminium Re-Melting/Refining)  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                                                                                                                             |
| 8.6 Output Quantity determination                     | Conformance    | The Entity has determined the method to calculate and record the Output Quantity for the Material Accounting Period.                                                                                                                                                                                                                                                                              |
| 8.7 Output Quantity designation                       | Conformance    | The Entity has determined the method to calculate and record the Output Quantity for the Material Accounting Period, being considered as 100% CoC Material. The Entity, with information on the percentage and volume of the ASI Aluminium under the control of the Entity, will complete calculations of the mass balance and the availability of metal for sale discounting any process losses. |
| 8.8 Output Quantity – Pre-Consumer Scrap              | Conformance    | The Entity produces Pre-Consumer Scrap during its production process and uses the Input Percentage for the Material Accounting Period provided to determine the Output Quantity of Eligible Scrap.                                                                                                                                                                                                |
| 8.9 Outputs not exceed Inputs                         | Conformance    | The Entity's ASI Manual defines the method to calculate and record the total percentage of CoC Materials for the Material Accounting Period, ensuring that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage as applied to the total CoC Material and/or Eligible Scrap Input during the Material Accounting Period.                     |
| 8.10a Internal Overdraws (not exceed 20%)             | Conformance    | The Entity has determined that the Internal Overdraw must not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period.                                                                                                                                                                                                                                          |
| 8.10b Internal Overdraws (not exceed affected amount) | Conformance    | The Entity has determined that the Internal Overdraw must not exceed the amount of CoC Material Input for the Material Accounting Period for the Force Majeure situation.                                                                                                                                                                                                                         |
| 8.10c Internal Overdraws (period to make up)          | Conformance    | The Entity has determined that the Internal Overdraw must not exceed the amount of CoC Material Input and will be made up within the subsequent Material Accounting Period.                                                                                                                                                                                                                       |
| 8.11a Positive Balance (carry over)                   | Conformance    | The Entity has developed a Material Accounting System for CoC Materials, which includes the use of spreadsheets and a computerised system. The                                                                                                                                                                                                                                                    |

| CRITERION                       | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                     |
|---------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                 |             | Material Accounting System identifies the Positive Balance transfer system to the next Material Accounting Period.                                                                                                                                                                                                          |
| 8.11b Positive Balance (expiry) | Conformance | The Entity has developed a Material Accounting System for CoC Materials, which includes the use of spreadsheets and a computerised system. The Material Accounting System identifies the Positive Balance to expire at the end of the subsequent Material Accounting Period.                                                |
| 9 ISSUING CoC DOCUMENTS         |             |                                                                                                                                                                                                                                                                                                                             |
| 9.1 Shipments and transfers     | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice or delivery note, which contains information on the shipment including the issuing Entity, recipient, product type, net shipping weight, date of issue and reference number. |
| 9.2a Date of issue              | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice or delivery note, which contains information on the shipment including the date of issue.                                                                                    |
| 9.2b Reference number           | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice or delivery note, which contains information on the shipment including the issuing Entity, recipient, product type, net shipping weight, date of issue and reference number. |
| 9.2c Issuing Entity             | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice or delivery note, which contains information on the shipment including the issuing Entity, recipient, product type, net shipping weight, date of issue and reference number. |
| 9.2d Receiving customer         | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice or delivery note, which contains information on the shipment including the address of the customer who will receive the CoC Document.                                        |
| 9.2e Responsible employee       | Conformance | The Entity has defined the CoC Document sent with each shipment of CoC Material. The Entity's Aluminium products are accompanied by an invoice                                                                                                                                                                              |

| CRITERION                                    | RATING         | COMMENT                                                                                                                                                                                                                                                                                       |
|----------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              |                | or delivery note, which contains information on the shipment including the issuing Entity, recipient, product type, net shipping weight, date and reference number and data of the responsible employee of the Entity who can verify the CoC Document information at the final destination.   |
| 9.2f Conformance statement                   | Conformance    | The Entity has defined the document CoC that will be sent in all shipments of certified products, considering that the Aluminium can be accompanied by invoices/delivery notes, which contain the information: "The information provided in the CoC Document complies with ASI standard CoC." |
| 9.2g Type of CoC Material                    | Conformance    | The Entity has defined the CoC Document sent with each shipment of CoC Material, which includes the type of CoC Material in the shipment.                                                                                                                                                     |
| 9.2h Mass of CoC Material                    | Conformance    | The Entity has defined the CoC Document sent with each shipment of CoC Material, which includes the mass of total Material in the shipment.                                                                                                                                                   |
| 9.2i Mass of total material                  | Conformance    | The Entity has defined the CoC Document sent with each shipment of CoC Material, which includes the mass of total Material in the shipment.                                                                                                                                                   |
| 9.3a Sustainability Data (optional)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.                                                                                                                                                                                                                         |
| 9.3b Sustainability Data (passing on)        | Conformance    | The Entity will not make Sustainability Data available in the CoC Document initially, only when requested and agreed with the receiving Entity.                                                                                                                                               |
| 9.3c Post-Casthouse ASI Certification status | Conformance    | The Entity will not make Sustainability Data available in the CoC Document initially, only when requested and agreed with the receiving Entity.                                                                                                                                               |
| 9.4 Supplementary Information (optional)     | Conformance    | The Entity will not make Supplementary Information available in the CoC Document initially, only when requested and agreed with the receiving Entity.                                                                                                                                         |
| 9.5 Response to verification requests        | Conformance    | The Entity has defined in the ASI Manual the system to guarantee the information in the CoC Documents when requested by the Entity receiving CoC Material.                                                                                                                                    |
| 9.6 Error management                         | Conformance    | The Entity has defined in the ASI Manual, the method for correcting possible non-conformances after sending the CoC Material or Eligible Scrap, as defined in the non-conformance and corrective action procedure.                                                                            |

| CRITERION                                     | RATING      | COMMENT                                                                                                                                                                                                                                 |
|-----------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10.1 Verify required information included     | Conformance | The Entity has defined a process and the response for verifying the required information in received CoC Documents. However, the Entity has not yet received any CoC Material from suppliers.                                           |
| 10.2 Verify consistency with shipments        | Conformance | The Entity has implemented a process of receiving certified materials. However, they have not yet received any CoC Material from suppliers.                                                                                             |
| 10.3 Verify supplier CoC Certification status | Conformance | The Entity checks the ASI website on a regular basis to verify the validity and scope of the supplier's ASI Chain of Custody Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap. |
| 10.4 Error management                         | Conformance | The Entity has defined in the ASI Manual the method for correcting possible non-conformances after receiving CoC Material or Eligible Scrap, documented in the non-conformance and corrective action procedure.                         |

#### 11 MARKET CREDITS SYSTEM: ASI CREDITS

|                                               |                |                                                                                                 |
|-----------------------------------------------|----------------|-------------------------------------------------------------------------------------------------|
| 11.1a Material Accounting System – allocation | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.1b Link to Casthouse Products              | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.1c No double counting                      | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.1d No Positive Balance for ASI Credits     | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2a Date of issue                           | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2b Reference number                        | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2c Issuing Entity                          | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2d Receiving Entity                        | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2e Conformance statement                   | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.2f ASI Credits statement                   | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |

| CRITERION                                              | RATING         | COMMENT                                                                                         |
|--------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------|
| 11.2g Quantity                                         | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3a CoC Certification Scope – purchasing ASI Credits | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3b Material Accounting System – purchasing          | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3c Expiry                                           | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3d No re-trading                                    | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3e No allocation to physical products               | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3f Verify supplier CoC Certification status         | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |
| 11.3g Five years maximum for ASI Credits purchasing    | Not Applicable | This Criterion is not applicable, as the Entity does not engage with the Market Credits System. |

## 12 CLAIMS AND COMMUNICATIONS

|                           |             |                                                                                                                                                                                             |
|---------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12.1a ASI Claims Guide    | Conformance | The Entity has defined in the ASI Manual the method for making claims and using the ASI logo consistent with the ASI Claims Guide.                                                          |
| 12.1b Verifiable evidence | Conformance | The Entity has defined in the ASI Manual the method for making claims or using the ASI logo consistent with the ASI Claims Guide and that verifiable evidence exists to support the claims. |
| 12.1c Employee training   | Conformance | The Entity provides appropriate training so that the relevant Workers understand and properly communicate claims.                                                                           |

### **Document Control and Version History**

| Revision | Date             | Notes                                                                                                                                                               |
|----------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 0        | 25 March 2022    | Initial Certification Audit – Full Certification                                                                                                                    |
| 1        | 1 November 2023  | Surveillance Audit                                                                                                                                                  |
| 2        | 8 January 2025   | Extension to the Certification expiry date of 24 March 2025 has been approved, consistent with ASI's eligibility for CoC Standard Certification extension requests. |
| 3        | 3 September 2026 | Extension to the Certification expiry date (from 1 March 2027), consistent with ASI's voluntary option for CoC Standard Certification extensions.                   |