

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

SPEIRA

CERTIFICATE
NUMBER

28

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

6 MAY 2022

DATE OF EXPIRY

5 MAY 2025

CERTIFIED SINCE

6 MAY 2019

AUTHORISED BY

A handwritten signature in white ink on a dark grey background. The signature is stylized and appears to be 'J. H.' followed by a long horizontal line.

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Speira Chain of Custody certification includes Speira headquarters and production sites Grevenbroich, Hamburg, and Rheinwerk/Neuss (Germany), the joint venture site Alunorf (Germany) and Outsourcing Contractors that handle CoC Material.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Speira
ENTITY NAME	Speira
CERTIFICATION SCOPE	Speira Chain of Custody certification includes Speira headquarters and production sites Grevenbroich, Hamburg, and Rheinwerk/Neuss (Germany), the joint venture site Alunorf (Germany) and Outsourcing Contractors that handle CoC Material.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses• Post-Casthouses
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (10 October 2018 – 18 February 2019)• Surveillance Audit (14 December 2020)• Re-Certification and Scope Change Audit (24 – 25 May 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 10 October 2018 – 18 February 2019 (Initial Certification Audit)• 14 December 2020 (Surveillance Audit)• 24 – 25 May 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 24 April 2019 (Initial Certification Audit)• 9 August 2021 (Surveillance Audit)• 12 October 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 October 2018 – 18 February 2019)</u></p> <p>The audit scope covers the Grevenbroich, Hamburg, and Neuss (Germany) sites, as well as the joint venture site Alunorf (Germany). The scope also includes all Outsourced Contractors that handle the Entity's CoC Material.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Aluminium Smelting• Aluminium Re-melting/Refining

- Casthouses
- Post-Casthouse

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

Surveillance Audit (14 December 2020)

The audit scope covers the Grevenbroich, Hamburg, Neuss (Germany) sites, as well as the joint venture site Alunorf (Germany).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

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

At the time of the audit (December 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification and Scope Change Audit (24 – 25 May 2022)

The audit scope covers Speira headquarters and production sites in Rheinwerk/Neuss, Grevenbroich, Hamburg, and joint venture partner Alunorf. The scope also includes all outsourced contractors.

The ASI Multi-Site sampling approach was undertaken to include the production sites located in Rheinwerk/Neuss and Grevenbroich as well as Speira Headquarters.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

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

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
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The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 6 May 2022 – 5 May 2025

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 5 May 2025

CERTIFICATION NUMBER 28

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member committed to complying with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Production and Transformation category and holds ASI Performance Standard Certification.
1.2 Management system	Conformance	The Entity has established a Management System and a Management System Documentation Procedure for handling ASI Material and the use of ASI logos. The procedure describes the purpose, scope, responsibilities and the general system and workflow which gives governance of the CoC system.
1.3 Management system reviews	Conformance	The Entity has established procedures and processes to comply with the ASI Chain of Custody (CoC) criteria regarding the periodic review of the Management System and associated updates as required. An annual review of the regular Management Review process is established.
1.4 Management representative	Conformance	The Entity has appointed the Head of Sustainability as the responsible person for the ASI Chain of Custody Standard implementation and conformance.
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures that ensure relevant personnel are aware of and are competent in their responsibilities under the ASI Chain of Custody Standard.
1.6 Record keeping	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity's standard operating procedure defines the retention time required by the ASI Chain of Custody Standard.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has implemented an operating procedure to report the Input and Output Quantities of CoC Material to ASI Secretariat within three months after the end of each calendar year.

CRITERION	RATING	COMMENT
		The Entity has reported for the 2019, 2020 and 2021 reporting periods.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has implemented an operating procedure to report the Input and Output Quantities of CoC Material to ASI Secretariat within three months after the end of each calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has implemented an operating procedure to report any Positive Balance to the ASI Secretariat within three months after the end of each calendar year.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has implemented an operating procedure to report any Internal Overdraw to ASI Secretariat within three months after the end of each calendar year.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has implemented an operating procedure to report on the total Input quantities of Eligible Scrap to ASI Secretariat within three months after the end of each calendar year.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable as the Entity does not use ASI Market Credits System.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable as the Entity does not use ASI Market Credits System.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Conformance	The Entity has identified all applicable Outsourcing Contractors in their Certification Scope.
2.2a Control of CoC Material	Conformance	The Entity has established procedures and tools to govern and control ownership of CoC Material used by Outsourcing Contractors.
2.2b No further outsourcing	Conformance	The Entity has established procedures and governance to follow up and make sure Outsourcing Contractors are not using any other Contractors to perform work on CoC Material.
2.2c Risk assessment	Conformance	The Entity has established procedures and governance to follow up with Outsourcing Contractors regularly, including assessing and addressing risks during the qualification process.

CRITERION	RATING	COMMENT
2.3 Output Quantity	Conformance	The Entity has established procedures and systems to regularly collect the Output Quantity of CoC Material from Outsourcing Contractors. The Entity has an established Material Accounting System that provides the required information.
2.4 Verification and record-keeping	Conformance	The Entity has established procedures and a system to track and verify the consistency between the Output and Input Quantity of CoC Material to the Outsourcing Contractors. The accounting system consists of its Enterprise Resource System (ERP) and a Mass Balance System.
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	Conformance	The Entity is engaged in Aluminium Smelting and holds both ASI Performance Standard and Chain of Custody Certification.
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	The Entity is engaged in Aluminium Smelting and holds an ASI Performance Standard and Chain of Custody Certification.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. The production sites are included in the ASI Chain of Custody Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity is engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. The production sites are included in the ASI Chain of Custody Certification and Performance Standard Certification Scope.

CRITERION	RATING	COMMENT
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has implemented procedures and Policies stating that it will only use CoC Material for Re-melting/Refining in quantities that are equal to the annual Output of CoC Material
4.2b Post-Consumer Scrap	Conformance	The Entity has established procedures and an accounting system to govern the qualification of eligible Post-Consumer Scrap. Due Diligence processes are in place for qualifying and follow-up on scrap suppliers.
4.3a Supplier records	Conformance	The Entity has established an accounting system to record the identity, principals, and place/s of operation of all direct suppliers of Recyclable Scrap Material.
4.3b Cash payments	Not applicable	The Criterion is not applicable as the Entity does not accept cash payments.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Recycled Aluminium. These sites are included within the Entity's ASI CoC Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity produces Casthouse Products from Primary Aluminium and Recycled Aluminium. These sites are all ASI Performance Standard and Chain of Custody Standard Certified.
5.2 Casthouse Products	Conformance	The Entity has established an accounting system to link and trace the Input Quantity of CoC Material to the Casthouse to ensure that the identification numbers stamped on the Material can be linked to the Input Quantity of CoC Material for the Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's Post-Casthouse Facilities are included in the ASI CoC Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity's Post-Casthouse Facilities are included in the ASI Performance Certification Scope.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has established a sourcing Policy that ensures that it only uses aluminium from ASI CoC Certified Facilities.

CRITERION	RATING	COMMENT
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has established a Supplier Code of Conduct addressing Anti-Corruption. Suppliers must sign the Code of Conduct. The Speira Supplier Code of Conduct is available at: https://www.speira.com/certifications-policies
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has established a Supplier Responsible Sourcing Framework and suppliers must sign the Speira Supplier Code of Conduct.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has established a Supplier Code of Conduct addressing Human Rights Due Diligence. All suppliers must sign the Supplier Code of Conduct and Due Diligence is applied before it commences business with the Entity. Speira's Supplier Code of Conduct is available at: https://www.speira.com/certifications-policies
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has established a Supplier Responsible Sourcing framework including an assessment of Conflict-Affected and High-Risk Areas (CAHRAs). All suppliers must sign the Supplier Code of Conduct and Due Diligence is applied before it commences business with the Entity. Speira's Supplier Code of Conduct is available at: https://www.speira.com/certifications-policies
7.2 Risk assessment	Conformance	The Entity has established a Supplier Code of Conduct including a risk-assessment and qualification process for all new suppliers.
7.3 Complaints mechanism	Conformance	The Entity has established complaint mechanisms for concerns raised through different channels, such as the company website: https://www.speira.com/contact
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Material Accounting System to govern and report on the Input Quantity and Output Quantity of CoC Material and Non-CoC Material.
8.2a Post-Consumer Scrap	Conformance	The Entity has established a Material Accounting System to manage and report on the Input Quantity of Post-Consumer Scrap.

CRITERION	RATING	COMMENT
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has established a Material Accounting System developed to manage and report on the Input Quantity of Pre-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has established a Material Accounting System to manage and report on the Input Quantity of Pre-Consumer Scrap for CoC Material and Non-CoC Material.
8.3 Material Accounting Period	Conformance	The Entity has established the 12 month period from January to December as its Material Accounting Period.
8.4 Input Percentage	Conformance	The Entity's Material Accounting System calculates the Input Percentage.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity's Material Accounting System calculates the Input Percentage of Eligible Recyclable Scrap regarding Re-melting/Refining.
8.6 Output Quantity determination	Conformance	The Entity's Material Accounting System calculates the Output Quantity by mass.
8.7 Output Quantity designation	Conformance	The Entity's Material Accounting System controls the Output Quantity designated as 100% CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity's Material Accounting System calculates the Output Quantity from internal Eligible Pre-Consumer Scrap in line with the ASI requirement.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure that Outputs do not exceed Inputs.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established procedures and systems to control the material accounting and ensure that Internal Overdraw does not exceed 20%.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure that an Internal Overdraw does not exceed the amount of CoC Material when affected by a Force Majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure an

CRITERION	RATING	COMMENT
		Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure a Positive Balance is carried over to the subsequent Material Accounting Period.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System and internal control mechanisms ensure the Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn down.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material Input and Output.
9.2a Date of issue	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with the issue date.
9.2b Reference number	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with a reference number and Material code.
9.2c Issuing Entity	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information of the issuing Entity.
9.2d Receiving customer	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the receiving customer.
9.2e Responsible employee	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information of the responsible employee of the Entity who can verify information in the CoC Document.
9.2f Conformance statement	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with a statement of conformance.

CRITERION	RATING	COMMENT
9.2g Type of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the type of CoC Material shipped.
9.2h Mass of CoC Material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the mass of CoC Material.
9.2i Mass of total material	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the mass of total Material.
9.3a Sustainability Data (optional)	Conformance	The Entity will provide Sustainability Data upon request by the customer such as Greenhouse Gas (GHG) Emissions data.
9.3b Sustainability Data (passing on)	Conformance	The Entity will provide Sustainability data upon request by customers, if available.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity will provide the ASI Certification status of the Post-Casthouse to customers, as appropriate.
9.4 Supplementary Information (optional)	Conformance	The Entity will provide any Supplementary Information to customers, as appropriate.
9.5 Response to verification requests	Conformance	The Entity has demonstrated it cooperates closely with customers buying CoC Material and regularly provides a report with Material references to its customers. And it provides support for requests for the verification of information.
9.6 Error management	Conformance	The Entity has developed an error management procedure to record and manage situations where an error is detected.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has developed a Management System procedure and has established routines to regularly check and verify received CoC Documents.
10.2 Verify consistency with shipments	Conformance	The Entity has developed a Management System procedure and has established routines to regularly check the consistency of the CoC Documents before recording information in the Accounting System.

CRITERION	RATING	COMMENT
10.3 Verify supplier CoC Certification status	Conformance	The Entity has developed a Management System procedure and established routines to regularly check the ASI website to verify the validity and scope of the supplier's ASI Chain of Custody Certification.
10.4 Error management	Conformance	The Entity has developed an error management procedure to record and manage situations when an error has occurred.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.1b Link to Casthouse Products	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.1c No double counting	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.1d No Positive Balance for ASI Credits	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2a Date of issue	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2b Reference number	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2c Issuing Entity	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2d Receiving Entity	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2e Conformance statement	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2f ASI Credits statement	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.2g Quantity	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3b Material Accounting System – purchasing	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3c Expiry	Not applicable	The Entity will not be engaging ASI Market Credit System.

CRITERION	RATING	COMMENT
11.3d No re-trading	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3e No allocation to physical products	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3f Verify supplier CoC Certification status	Not applicable	The Entity will not be engaging ASI Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not applicable	The Entity will not be engaging ASI Market Credit System.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has developed a procedure for claims and communications for when or if it makes any ASI-related claims. The procedure is structured and follows the principles of the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has developed a procedure for claims and communications for when or if it makes any ASI-related claims. The procedure is structured and follows the principles of the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity has developed a procedure for claims and communications for when or if it makes any ASI-related claims. The procedure is structured and follows the principles of the ASI Claims Guide and includes training instructions.

Document Control and Version History

Revision	Date	Notes
0	6 May 2019	Initial Certification Audit – Full Certification
1	14 September 2021	Surveillance Audit; Minor update to the layout of the Audit Scope description for the Initial Certification Audit.
2	20 December 2021	Transfer of Certification to Speira from Hydro Aluminium Rolled Products – Provisional Certification.
3	27 October 2022	Re-Certification Audit - Full Certification