

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# HYDRO ALUMINIUM EXTRUDED SOLUTIONS

CERTIFICATE  
NUMBER

80

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

7 APRIL 2023

DATE OF EXPIRY

6 APRIL 2026

CERTIFIED SINCE

7 APRIL 2020

AUTHORISED BY

A stylized, handwritten signature in white ink, consisting of a large, flowing 'A' followed by a 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](http://www.aluminium-stewardship.org)**

CERTIFICATION SCOPE

Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites: Albi (France), Avintes (Portugal), Birtley (UK), Bedwas (UK), Chateauroux (France), Cheltenham (UK), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Harderwijk (Netherlands), Hoogezand (Netherlands), La Roca (Spain), La Selva (Spain), Lichtervelde (Belgium), Łódź (Poland), Lucé Extrusion (France), Magnor (Norway), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Puget sur Argens (France), Rackwitz (extrusion) (Germany), Raeren (Belgium), Sjunnen (Sweden), Székesfehérvár (Hungary), Tibshelf (UK), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Trzcianka (Poland), Uphusen (Germany), Vetlanda (Sweden) and Žiar nad Hronom (Slovakia).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| MEMBER NAME             | Hydro                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ENTITY NAME             | Hydro Aluminium Extruded Solutions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| CERTIFICATION SCOPE     | Hydro Extruded Solutions for activities including ingot casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites: Albi (France), Avintes (Portugal), Birtley (UK), Bedwas (UK), Chateauroux (France), Cheltenham (UK), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Harderwijk (Netherlands), Hoogezand (Netherlands), La Roca (Spain), La Selva (Spain), Lichtervelde (Belgium), Łódź (Poland), Lucé Extrusion (France), Magnor (Norway), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Puget sur Argens (France), Rackwitz (extrusion) (Germany), Raeren (Belgium), Sjunnen (Sweden), Székesfehérvár (Hungary), Tibshelf (UK), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Trzcianka (Poland), Uphusen (Germany), Vetlanda (Sweden) and Žiar nad Hronom (Slovakia). |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><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>First Certification Audit (12 November 2019 – 24 January 2020)</li><li>Scope Change Audit (5 – 6 May 2020)</li><li>Scope Change Audit (18 – 19 June 2020)</li><li>Scope Change Audit (17 – 21 August 2020)</li><li>Scope Change Audit (12 November 2020)</li><li>Scope Change Audit (7 December 2020)</li><li>Scope Change Audit (20 January 2021)</li><li>Surveillance Audit (27 April – 3 June 2021)</li><li>Scope Change Audit (6 - 9 July 2021)</li><li>Scope Change Audit (11 - 12 November 2021)</li><li>Scope Change Audit (26 - 27 October 2021)</li><li>Scope Change Audit (28 February – 1 March 2022)</li><li>Scope Change Audit (28 April – 29 April 2022)</li></ul>                                                                                                                                                                                                                                                                             |

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|                         | <ul style="list-style-type: none"> <li>Re-Certification Audit and Scope Change (10 January – 21 February 2023)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| AUDIT DATE              | <ul style="list-style-type: none"> <li>12 November 2019 – 24 January 2020 (Certification Audit)</li> <li>5 – 6 May 2020 (Scope Change Audit)</li> <li>18 – 19 June 2020 (Scope Change Audit)</li> <li>17 – 21 August 2020 (Scope Change Audit)</li> <li>12 November 2020 (Scope Change Audit)</li> <li>7 December 2020 (Scope Change Audit)</li> <li>20 January 2021 (Scope Change Audit)</li> <li>27 April – 3 June 2021 (Surveillance Audit)</li> <li>6 – 9 July 2021 (Scope Change Audit)</li> <li>11 – 12 November 2021 (Scope Change Audit)</li> <li>26 – 27 October 2021 (Scope Change Audit)</li> <li>28 February – 1 March 2022 (Scope Change Audit)</li> <li>28 April – 29 April 2022 (Scope Change Audit)</li> <li>10 January – 21 February 2023 (Re-Certification Audit and Scope Change)</li> </ul> |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"> <li>4 April 2020 (Certification Audit)</li> <li>8 July 2020 (Scope Change Audit)</li> <li>31 August 2020 (Scope Change Audit)</li> <li>25 September 2020 (Scope Change Audit)</li> <li>3 December 2020 (Scope Change Audit)</li> <li>26 January 2021 (Scope Change Audit)</li> <li>10 February 2021 (Scope Change Audit)</li> <li>28 June 2021 (Surveillance Audit)</li> <li>1 August 2021 (Scope Change Audit)</li> <li>3 January 2022 (Scope Change Audit)</li> <li>16 February 2022 (Scope Change Audit)</li> <li>1 April 2022 (Scope Change Audit)</li> <li>27 June 2022 (Scope Change Audit)</li> <li>25 March 2023 (Re-Certification Audit and Scope Change)</li> </ul>                                                                                                |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (12 November 2019 – 24 January 2020)</u></p> <p>The Audit Scope covered the activities at the Hydro sites: Birtley (UK), Bedwas (UK), Cheltenham (UK), Chrzanów (Poland), Tibshelf (UK), Tønder Precision Tubing (Denmark) and Trzcianka (Poland).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> <li>Casthouses</li> <li>Post-Casthouse</li> </ul>                                                                                                                                                                                                                                                                                                                                                                       |

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

First Scope Change Audit (5 – 6 May 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Łódź (Poland).

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

At the time of the audit (May 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.

Second Scope Change Audit (18 – 19 June 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Székesfehérvár (Hungary).

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

At the time of the audit (June 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.

Third Scope Change Audit (17 – 21 August 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Nenzing (Austria).

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

Fourth Scope Change Audit (12 November 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Tønder Extrusion (Denmark).

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

Fifth Scope Change Audit (7 December 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Offenberg (Germany).

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Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

#### Sixth Scope Change Audit (20 January 2021)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Rackwitz (extrusion) (Germany) and Uphusen (Germany).

Supply chain activities included in the Audit Scope:

- Post-Casthouse

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

At the time of the audit (January 2021), 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.

#### Surveillance Audit (27 April – 3 June 2021)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Cheltenham (UK), Tibshelf (UK) and Tønder Precision Tubing (Denmark).

Supply chain activities included in the Audit Scope:

- 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 - June 2021), 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.

#### Seventh Scope Change Audit (6 – 9 July 2021)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions Iberia sites Avintes (Portugal) and La Roca, La Selva and Navarra (Spain).

The ASI multi-site sampling approach was undertaken with the Avintes and La Roca sites audited but not visited.

Supply chain activities included in the Audit Scope:

- 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 (July 2021), access to the La Selva site was not possible, due to COVID-19 related travel restrictions. The La Selva audit has

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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.

#### Eight Scope Change Audit (11 – 12 November 2021)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites Ornago and Feltre (Italy).

Supply chain activities included in the Audit Scope:

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

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

#### Ninth Scope Change Audit (26 - 27 October 2021)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites Vetlanda, Finspång and Sjunnen (Sweden).

Supply chain activities included in the Audit Scope:

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

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

#### Tenth Scope Change Audit (28 February – 1 March 2022)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites including the Casthouse and extrusion Facility at Puget sur Argens and extrusion Facilities at Albi, Chateauroux and Lucé (France).

Supply chain activities included in the Audit Scope:

- 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 (February - March 2022), access to the sites 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 and interviews with relevant personnel.

#### Eleventh Scope Change Audit (28 February – 1 March 2022)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Drunen including Pole Products, Ghlin, Harderwijk, Hoogezand, Lichtervelde, and Raeren.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
-

- Casthouses
- Post-Casthouse

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

Re-Certification Audit and Twelfth Scope Change (10 January – 21 February 2023)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites at Avintes, Bedwas, Birtley, Cheltenham, La Roca, La Selva (Spain), Magnor, Navarra, Nenzing, Offenburg, Rackwitz (extrusion), Tibshelf, Uphusen and Žiar nad Hronom.

Supply chain activities included in the Audit Scope:

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

The audit of the sites Cheltenham, Offenburg, La Roca, Magnor and Žiar nad Hronom were undertaken on-site and the remaining sites were undertaken remotely, consistent with the ASI multi-site sampling approach.

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

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| AUDIT OUTCOME                 | <ul style="list-style-type: none"> <li>• Certification</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| AUDIT METHODOLOGY DECLARATION | <p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li>☑ 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.</li> <li>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul> |
| CERTIFICATION PERIOD          | 7 April 2023 – 6 April 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| NEXT AUDIT TYPE               | Re-Certification Audit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| NEXT AUDIT DUE DATE           | 6 April 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| CERTIFICATE NUMBER            | 80                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## 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 also holds certification for the ASI Performance Standard.                                                                                                                                                                                                                                                 |
| 1.2 Management system                      | Conformance | The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. An ASI Management System document is developed. The document describes in detail the Management System, purpose, scope, responsibilities, functions, management, management reviews, corrective and preventative measures and documentation and records retention, which gives governance of the CoC system. |
| 1.3 Management system reviews              | Conformance | The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. An ASI Management System document is developed. The document describes in detail the Management System, purpose, scope, responsibilities, functions, management, management reviews, corrective and preventative measures and documentation and records retention, which gives governance of the CoC system. |
| 1.4 Management representative              | Conformance | The Entity has appointed a member of management to be responsible for the implementation of the ASI Chain of Custody Standard and has defined a chart of responsibilities for different tasks throughout the organisation.                                                                                                                                                                                                                   |
| 1.5 Training                               | Conformance | The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard.                                                                                                                                                                                                                                         |
| 1.6 Record keeping                         | Conformance | The Entity has implemented and maintained up-to-date records (Management System) addressing all applicable requirements of the ASI Chain of Custody Standard.                                                                                                                                                                                                                                                                                |
| 1.7a Reporting to ASI (Inputs and Outputs) | Conformance | The Entity has an operating procedure that specifies the Entity will report Input and Output Quantities of CoC Material to ASI within three months after each calendar year.                                                                                                                                                                                                                                                                 |

| CRITERION                                              | RATING         | COMMENT                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.7b Reporting to ASI (Input Percentage)               | Conformance    | The Entity has an operating procedure that specifies that the Entity will report Input and Output Quantities of CoC Material to ASI within three months after the end of each calendar year.                                                                                                                             |
| 1.7c Reporting to ASI (Positive Balance)               | Conformance    | The Entity has an operating procedure that specifies that the Entity will report Positive Balance of CoC Material to ASI within three months after the end of each calendar year.                                                                                                                                        |
| 1.7d Reporting to ASI (Internal Overdraw)              | Conformance    | The Entity has an operating procedure that specifies that the Entity will report any Internal Overdraw of CoC Material to ASI within three months after the end of each calendar year.                                                                                                                                   |
| 1.7e Reporting to ASI (Eligible Scrap)                 | Conformance    | The Entity has an operating procedure that specifies that the Entity will report on total Input Quantities of Eligible Scrap to ASI 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 engage in purchasing/selling ASI Credits.                                                                                                                                                                                                                        |
| 1.7g Reporting to ASI (ASI Credits purchased)          | Not Applicable | This Criterion is not applicable as the Entity does not engage in purchasing/selling ASI Credits.                                                                                                                                                                                                                        |
| 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 Materials used by outsourcing partners.                                                                                                                                                                                           |
| 2.2b No further outsourcing                            | Conformance    | The Entity has established procedures and tools to govern and control ownership of CoC Materials used by outsourcing partners.                                                                                                                                                                                           |
| 2.2c Risk assessment                                   | Conformance    | The Entity has assessed the risk of potential Non-Conformance with the ASI Chain of Custody Standard resulting from the engagement of each Outsourcing Contractor. The CoC Management System includes relevant guidelines and procedures e.g., Due Diligence procedure, procurement, and supplier risk assessment tools. |
| 2.3 Output Quantity                                    | Conformance    | The Entity has established processes to ensure that the Outsourcing Contractor provides information on the Output Quantity of CoC Material to the Entity after the Entity's Material Accounting Period.                                                                                                                  |
| 2.4 Verification and record-keeping                    | Conformance    | The Entity has established processes to verify that the Output Quantity of CoC Material is consistent                                                                                                                                                                                                                    |

| CRITERION                                                                       | RATING         | COMMENT                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                 |                | with the Input Quantity of CoC Material provided to the Outsourcing Contractor and records it in its Material Accounting System.                                                                                     |
| 2.5 Error management                                                            | Conformance    | The Entity has established processes to manage errors discovered after CoC Material has been shipped. The Entity and the Outsourcing Contractor document the error and the corrective action.                        |
| 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                    | Conformance    | The Entity is engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. The production sites are within the scope of ASI Chain of Custody Certification.                                               |
| 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 within the scope of ASI Chain of Custody Certification.                                               |
| 4.2a Pre-Consumer Scrap and Dross                                               | Conformance    | The Entity has procedures and policies defining that it will only use CoC Material for Re-melting/Refining as part of 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 following up on scrap suppliers. |
| 4.3a Supplier records                                                           | Conformance    | The Entity has an accounting system to record the identity, principals, and place/s of operation of all Recyclable Scrap Material direct suppliers.                                                                  |

| CRITERION                                                                | RATING      | COMMENT                                                                                                                                                                                                |
|--------------------------------------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.3b Cash payments                                                       | Conformance | The Entity does not make cash payments.                                                                                                                                                                |
| 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM                                 |             |                                                                                                                                                                                                        |
| 5.1a CoC Certification Scope – Casthouses                                | Conformance | The Entity has a system that ensures ASI Aluminium is produced only from Casthouses that are either within the Entity's CoC Certification Scope or are Certified against the ASI Performance Standard. |
| 5.1b ASI Performance Standard – Casthouses                               | Conformance | The Entity has a system that ensures ASI Aluminium is produced only from Casthouses that are either within the Entity's CoC Certification Scope or are Certified against the ASI Performance Standard. |
| 5.2 Casthouse Products                                                   | Conformance | The Entity has implemented a Material Accounting System to ensure that unique identification numbers are linked to the Input Quantity of CoC Material for that Material Accounting Period.             |
| 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM                             |             |                                                                                                                                                                                                        |
| 6.1a CoC Certification Scope – Post-Casthouse                            | Conformance | The Entity has an operating procedure and cooperates with ASI Certified Suppliers to secure the supply and production of ASI CoC Materials.                                                            |
| 6.1b ASI Performance Standard – Post-Casthouse                           | Conformance | The Entity has an operating procedure and cooperates with ASI Certified Suppliers to secure the supply and production of ASI CoC Materials.                                                            |
| 6.1c Sourcing ASI Aluminium                                              | Conformance | The Entity has an operating procedure and cooperates with ASI Certified Suppliers to secure the supply and production of ASI CoC Materials.                                                            |
| 7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL         |             |                                                                                                                                                                                                        |
| 7.1a Responsible sourcing policy (anti-corruption)                       | Conformance | The Entity has a Responsible Sourcing Policy covering all aspects of the ASI Chain of Custody Standard and the ASI Performance Standard.                                                               |
| 7.1b Responsible sourcing policy (responsible sourcing)                  | Conformance | The Entity has a Responsible Sourcing Policy for Aluminium, which conforms to the requirements of the ASI Chain of Custody Criteria and ASI Performance Standard.                                      |
| 7.1c Responsible sourcing policy (human rights due diligence)            | Conformance | The Entity has Policies, procedures, and processes for Responsible Sourcing and Human Rights Due Diligence that conform to the requirements of the ASI Chain of Custody and ASI Performance Standard.  |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance | The Entity has policies, procedures and processes that conform to the requirements of the ASI Chain of Custody Standard and ASI Performance Standard.                                                  |

| CRITERION                                                | RATING      | COMMENT                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.2 Risk assessment                                      | Conformance | The Entity has a procurement Risk Assessment and ASI CoC Management System file, including relevant guidelines and procedures (e.g., Due Diligence procedure, procurement Risk Assessment tools and supplier risk assessment tools).                                                                                                                               |
| 7.3 Complaints mechanism                                 | Conformance | The Entity has implemented an accessible, transparent, understandable, and culturally and gender-sensitive Complaints Resolution Mechanism to address stakeholder complaints, grievances and requests for information relating to its operations. This is available at:<br><a href="https://www.hydro.com/en/contact-us/">https://www.hydro.com/en/contact-us/</a> |
| 8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM    |             |                                                                                                                                                                                                                                                                                                                                                                    |
| 8.1 Material Accounting System                           | Conformance | The Entity has established a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass.                                                                                                                                                                                                              |
| 8.2a Post-Consumer Scrap                                 | Conformance | The Entity has a Material Accounting System to manage and report on Input Quantity of Post-Consumer Scrap.                                                                                                                                                                                                                                                         |
| 8.2b Pre-Consumer Scrap (total)                          | Conformance | The Entity has a Material Accounting System developed to manage and report on Input Quantity of Pre-Consumer Scrap.                                                                                                                                                                                                                                                |
| 8.2c Pre-Consumer Scrap (Eligible Scrap)                 | Conformance | The Entity has a Material Accounting System to manage and report on Input Quantity of Pre-Consumer Scrap delivering both CoC and Non-CoC Material.                                                                                                                                                                                                                 |
| 8.3 Material Accounting Period                           | Conformance | The Entity has defined a 12-month rolling period as its Material Accounting Period.                                                                                                                                                                                                                                                                                |
| 8.4 Input Percentage                                     | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody Standard requirements.                                                                                                                                                                                                                                         |
| 8.5 Input Percentage (Aluminium Re-Melting and Refining) | Conformance | The Entity calculates the Input Percentage of Eligible Recyclable Scrap in line with the ASI Chain of Custody Standard requirements.                                                                                                                                                                                                                               |
| 8.6 Output Quantity determination                        | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody Standard requirements.                                                                                                                                                                                                                                         |
| 8.7 Output Quantity designation                          | Conformance | The Entity has designated its Output Quantity as 100% CoC Material per its Material Accounting System procedures and processes.                                                                                                                                                                                                                                    |

| CRITERION                                             | RATING      | COMMENT                                                                                                                                                                                              |
|-------------------------------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.8 Output Quantity – Pre-Consumer Scrap              | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody Standard requirements.                                                                           |
| 8.9 Outputs not exceed inputs                         | Conformance | The Entity has established a Material Accounting System in compliance with ASI Chain of Custody Standard requirements, and to have updated information on its inventory balance on a monthly basis.  |
| 8.10a Internal Overdraws (not exceed 20%)             | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.                                                                                    |
| 8.10b Internal Overdraws (not exceed affected amount) | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.                                                                                    |
| 8.10c Internal Overdraws (period to make up)          | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.                                                                                    |
| 8.11a Positive Balance (carry over)                   | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.                                                                                    |
| 8.11b Positive Balance (expiry)                       | Conformance | The Entity has established a Material Accounting System in compliance with the ASI Chain of Custody requirements.                                                                                    |
| 9 ISSUING COC DOCUMENTS                               |             |                                                                                                                                                                                                      |
| 9.1 Shipments and transfers                           | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements. |
| 9.2a Date of issue                                    | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements. |
| 9.2b Reference number                                 | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements. |
| 9.2c Issuing Entity                                   | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored                                                              |

| CRITERION                             | RATING      | COMMENT                                                                                                                                                                                                                                                                             |
|---------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |             | according to the ASI Chain of Custody Standard requirements.                                                                                                                                                                                                                        |
| 9.2d Receiving customer               | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.2e Responsible employee             | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.2f Conformance statement            | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.2g Type of CoC Material             | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.2h Mass of CoC Material             | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.2i Mass of total material           | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.3a Sustainability Data (optional)   | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements, including applicable Sustainability Data in the CoC Document for CoC Material. |
| 9.3b Sustainability Data (passing on) | Conformance | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements, including applicable Sustainability Data in the CoC Document for CoC Material. |

| CRITERION                                     | RATING         | COMMENT                                                                                                                                                                                                                                                                             |
|-----------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.3c Post-Casthouse ASI Certification status  | Conformance    | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements, including applicable Sustainability Data in the CoC Document for CoC Material. |
| 9.4 Supplementary Information (optional)      | Conformance    | The Entity has established a procedure and an ASI CoC Document template to ensure that CoC Documents are controlled, issued, and stored according to the ASI Chain of Custody Standard requirements.                                                                                |
| 9.5 Response to verification requests         | Conformance    | The Entity has established a procedure for responding to requests for verification of information in CoC Documents issued by the Entity.                                                                                                                                            |
| 9.6 Error management                          | Conformance    | The Entity has established procedures that include error management. The Entity informs relevant Stakeholders of errors and agrees on necessary corrective actions and improvements.                                                                                                |
| 10 RECEIVING COC DOCUMENTS                    |                |                                                                                                                                                                                                                                                                                     |
| 10.1 Verify required information included     | Conformance    | The Entity has established processes to ensure that CoC Documents are controlled, issued, and stored as per the ASI Chain of Custody Standard requirements.                                                                                                                         |
| 10.2 Verify consistency with shipments        | Conformance    | The Entity has established processes to ensure that CoC Documents are controlled, issued, and stored as per the ASI Chain of Custody Standard requirements.                                                                                                                         |
| 10.3 Verify supplier CoC Certification status | Conformance    | The Entity has established processes to ensure that CoC Documents are controlled, issued, and stored as per the ASI Chain of Custody Standard requirements.                                                                                                                         |
| 10.4 Error management                         | Conformance    | The Entity has established processes to ensure that CoC Documents are controlled, issued, and stored as per the ASI Chain of Custody Standard requirements.                                                                                                                         |
| 11 MARKET CREDITS SYSTEM: ASI CREDITS         |                |                                                                                                                                                                                                                                                                                     |
| 11.1a Material Accounting System – allocation | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                                                                                               |
| 11.1b Link to Casthouse Products              | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                                                                                               |
| 11.1c No double counting                      | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                                                                                               |

| CRITERION                                              | RATING         | COMMENT                                                                                                                                                                                                  |
|--------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11.1d No Positive Balance for ASI Credits              | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2a Date of issue                                    | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2b Reference number                                 | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2c Issuing Entity                                   | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2d Receiving Entity                                 | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2e Conformance statement                            | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2f ASI Credits statement                            | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.2g Quantity                                         | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3a CoC Certification Scope – purchasing ASI Credits | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3b Material Accounting System – purchasing          | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3c Expiry                                           | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3d No re-trading                                    | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3e No allocation to physical products               | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3f Verify supplier CoC Certification status         | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| 11.3g Five years maximum for ASI Credits purchasing    | Not Applicable | This Criterion is not applicable as the Entity does not use the Market Credit System.                                                                                                                    |
| <b>12 CLAIMS AND COMMUNICATIONS</b>                    |                |                                                                                                                                                                                                          |
| 12.1a ASI Claims Guide                                 | Conformance    | The Entity has developed policies, systems, procedures, and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are consistent with the ASI Claims Guide. |

| CRITERION                 | RATING      | COMMENT                                                                                                                                                                                                  |
|---------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12.1b Verifiable evidence | Conformance | The Entity has developed policies, systems, procedures, and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are consistent with the ASI Claims Guide. |
| 12.1c Employee training   | Conformance | The Entity has developed policies, systems, procedures, and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are consistent with the ASI Claims Guide. |

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

| Revision | Date              | Notes                                                                                                                                                                                                                                  |
|----------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 0        | 7 April 2020      | Issued (Full Certification)                                                                                                                                                                                                            |
| 1        | 11 June 2020      | Correction to Conformance rating of criterion 2.1                                                                                                                                                                                      |
| 2        | 14 July 2020      | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions site Łódź (Poland).                                                                                                              |
| 3        | 18 September 2020 | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions site Székesfehérvár (Hungary) and corrections to the supply chain activities and those specific to previous Scope Change Audits. |
| 4        | 30 September 2020 | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions site Nenzing (Austria).                                                                                                          |
| 5        | 17 December 2020  | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions site Tønder Extrusion (Denmark).                                                                                                 |
| 6        | 29 January 2021   | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions site Offenburg (Germany).                                                                                                        |
| 7        | 26 February 2021  | Updated to reflect Certification Scope change with the addition of Hydro Aluminium Extruded Solutions sites Rackwitz (extrusion) (Germany) and Uphusen (Germany).                                                                      |
| 8        | 8 July 2021       | Surveillance Audit                                                                                                                                                                                                                     |
| 9        | 25 August 2021    | Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions Iberia sites Avintes (Portugal) and La Roca, La Selva and Navarra (Spain); and the Supply Chain Activity Aluminium Re-melting/Refining. |
| 10       | 12 January 2022   | Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions sites Ornago and Feltre (Italy).                                                                                                        |
| 11       | 21 February 2022  | Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions sites Vetlanda, Finspång and Sjunnen (Sweden).                                                                                          |
| 12       | 7 April 2022      | Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions sites Albi, Chateauroux, Lucé and Puget sur Argens (France).                                                                            |
| 13       | 18 July 2022      | Scope Change Audit – Certification Scope updated to include Hydro Aluminium Extruded Solutions sites Drunen including Pole Products, Ghlin, Harderwijk, Hoogezand, Lichtervelde, and Raeren.                                           |
| 14       | 7 April 2023      | Re-Certification Audit and Scope Change– Certification Scope updated to include Hydro Aluminium Extruded Solutions sites Magnor (Norway) and Žiar nad Hronom (Slovakia).                                                               |