

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

UC Rusal

CERTIFICATE NUMBER

35

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

20 DECEMBER 2023

DATE OF EXPIRY

19 DECEMBER 2026

CERTIFIED SINCE

20 JUNE 2019

AUTHORISED BY

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Headquarters (Moscow, Russia) manages the following facilities: JSC Bauxite Timana (Bauxite mining, Russia); JSC United Company RUSAL Ural Aluminum Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining, Russia); Affiliate of PJSC "RUSAL Bratsk" in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikenborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); JSC Boguchany Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); JSC RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); PJSC RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consists of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication, Russia); Aughinish Alumina (AAL) (Alumina refining, Ireland); United Company RUSAL Kandalaksha Aluminium Smelter (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanal (Semi-fabrication, Russia); CJSC RUSAL Armendal (Semi-fabrication, Armenia); JSC RUSAL Novokuznetsk (NkAZ) (Aluminium smelting, casthouse, Russia); United Company RUSAL Volgograd Aluminium Smelter (VgAZ) (Aluminium smelting, casthouse, Russia); LLC RUSAL Taishet (TaAZ) (Aluminium smelting, casthouse, Russia); Aluminium Rheinfelden Alloys (casthouse, Germany); Rheinfelden Semis (semi-fabrication, Germany).

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	UC Rusal
ENTITY NAME	UC Rusal
CERTIFICATION SCOPE	<p>Headquarters (Moscow, Russia) manages the following facilities: JSC Bauxite Timana (Bauxite mining, Russia); JSC United Company RUSAL Ural Aluminum Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining, Russia); Affiliate of PJSC "RUSAL Bratsk" in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikemborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); JSC Boguchany Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); JSC RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); PJSC RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consists of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication, Russia); Aughinish Alumina (AAL) (Alumina refining, Ireland); United Company RUSAL Kandalaksha Aluminium Smelter (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanal (Semi-fabrication, Russia); CJSC RUSAL Armenal (Semi-fabrication, Armenia); JSC RUSAL Novokuznetsk (NkAZ) (Aluminium smelting, casthouse, Russia); United Company RUSAL Volgograd Aluminium Smelter (VgAZ) (Aluminium smelting, casthouse, Russia); LLC RUSAL Taishet (TaAZ) (Aluminium smelting, casthouse, Russia); Aluminium Rheinfelden Alloys (casthouse, Germany); Rheinfelden Semis (semi-fabrication, Germany).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (20 February – 28 March 2019)• Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)• Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)• Scope Change Audit (on-site: 26 October – 19 November 2021; desktop: 29 November – 1 December 2021)• Re-Certification and Scope Change Audit (24 March – 26 May 2022)• Re-Certification and Scope Change Audit (8 August – 24 November 2023)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 20 February – 28 March 2019 (Initial Certification Audit)

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- 20 April – 15 July 2020 (desktop) and 21 September – 1 October 2020 (on-site) (Scope Change Audit)
 - 14 – 23 April 2021 (desktop) and 20 May 2021 (on-site) (Surveillance Audit)
 - 26 October – 19 November 2021 (on-site) and 29 November – 1 December 2021 (desktop) (Scope Change Audit)
 - 24 March – 26 May 2022 (Re-Certification and Scope Change Audit)
 - 8 August – 24 November 2023 (Re-Certification and Scope Change Audit)
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AUDIT REPORT
SUBMISSION

- 21 May 2019 (Initial Certification Audit)
 - 11 November 2020 (Scope Change Audit)
 - 8 June 2021 (Surveillance Audit)
 - 15 December 2021 (Scope Change Audit)
 - 11 June 2022 (Re-Certification and Scope Change)
 - 1 December 2023 (Re-Certification and Scope Change Audit)
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AUDIT SCOPE

Initial Certification Audit (20 February – 28 March 2019)

The audit scope included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (bauxite mining, Russia); RUSAL Kamensk-Uralskiy (alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse, post-casthouse, Russia).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Casthouses
- Post-Casthouse

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

Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)

The audit scope included PJSC RUSAL Bratsk (Aluminium smelting, casthouse and semi-fabrication, Russia), JSC Boguchansk Aluminium Smelter (Aluminium smelting, casthouse, Russia), JSC RUSAL Krasnoyarsk (Aluminium smelting, casthouse, Russia), JSC RUSAL Sayanogorsk (Aluminium smelting, casthouse, Russia) and Kubikenborg Aluminium AB (Aluminium smelting, casthouse, Sweden).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

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

Due to COVID-19 related travel restrictions and in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), the scope change audits included two stages: 1. A desktop exercise, including a remote review of relevant documentation and, 2. On-site audits.

Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)

The audit scope included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (bauxite mining, Russia); RUSAL Kamensk-Uralskiy (alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting and casthouse, Russia).

Supply chain activities included in the audit scope:

- Bauxite Mining
 - Alumina Refining
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- Aluminium Smelting
 - Casthouses

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

At the time of the Audit (April – May 2021), access to all the sites was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit at UC Rusal Headquarters.

Scope Change Audit (on-site: 26 October – 19 November 2021; desktop 29 November – 1 December 2021)

The audit scope included Aughinish Alumina (AAL) (Alumina refining, Ireland); RUSAL Kandalaksha (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); Sayanal (Semi-fabrication, Russia); Armenal (Semi-fabrication, Armenia).

Supply chain activities included in the audit scope:

- Alumina Refining
- Aluminium Smelting
- 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 (October – December 2021), access to the Aughinish Alumina (AAL) site was not possible, due to COVID-19 related travel restrictions. The audit of this site has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation, interviews and site observations using teleconferencing capabilities. It is proposed that the Aughinish Alumina (AAL) site will be audited on site as part of the Re-Certification Audit scope.

Re-Certification and Scope Change Audit (24 March – 26 May 2022)

The audit scope included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (Moscow, Russia); PJSC RUSAL Bratsk (BRAZ) (Russia); Kubikenberg Aluminium AB (Sweden); Boguchansk Aluminium Smelter (Russia); Aughinish Alumina (Ireland); and Sayanal (Russia).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Casthouses
- Post-Casthouse

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

The audits of the Aughinish Alumina and Kubikenberg Aluminium AB were undertaken as a 'desktop' exercise using remote audit techniques, consistent with the ASI multi-site sampling approach.

Re-Certification and Scope Change Audit (8 August – 24 November 2023)

The audit scope included Aluminium Rheinfelden Alloys, CJSC "Rusal Armenal", Headquarters (Moscow, Russia), JSC "Boksit Timana", Rheinfelden Semis, RUSAL Kamensk-Uralskiy, JSC RUSAL Sayanogorsk (SAZ); RUSAL Novokuznetsk, RUSAL Taishet and RUSAL Volgograd.

Supply chain activities included in the audit scope:

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

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

AUDIT OUTCOME Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION PERIOD 20 December 2023 – 19 December 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 20 June 2025

CERTIFICATE NUMBER 35



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Entity, UC Rusal is one of the leading companies in the global aluminium industry, considered to be the second largest in the world currently, producing nearly six per cent of the world's primary aluminium. It produces metal with a low carbon footprint. Approximately 90 per cent of the Entity's aluminium is produced from innovative and energy-saving technologies, including renewable electricity. The Entity has demonstrated its ability to reduce greenhouse gas emissions at all production stages and the RUSAL ALLOW brand metal can be viewed as one of 'green' metal. The Entity's certification scope currently includes 18 facilities of all main types of production cycles in aluminium supply chain (bauxite mining, alumina production, aluminium smelting, re-melting/refining, casting and semi-fabrication). The Entity employs nearly 29,000 personnel across their Certification Scope in Armenia, Germany, Ireland, Russia and Sweden.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

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

	OVERALL
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity has been an ASI Member since December 2015 in the Production and Transformation class. Certification for the ASI Performance Standard and ASI Chain of Custody Standard has been ongoing since 2019: https://aluminium-stewardship.org/about-asi/asi-members/uc-rusal
1.2 CoC Management System	Conformance	The Entity's Management System has been implemented since 2019 in all sites. The established procedures and processes are compatible with the ASI Chain of Custody Standard regarding the periodic review of the Management System and associated updates.
1.3 CoC Management System Monitoring	Conformance	The Entity has established procedures and processes that are compatible with the ASI Chain of Custody Standard regarding the periodic review of the Management System.
1.4 Management Representative	Conformance	The Entity has appointed Management Representatives who are responsible for the ASI Chain of Custody Standard implementation and have sufficient authority to ensure the Entity's conformance with all applicable requirements.
1.5 Communications and Training	Conformance	The Entity has developed and maintained communication and training measures, which provide adequate training and keep all relevant personnel aware of, and competent in, their responsibilities under the ASI Chain of Custody Standard.
1.6 Records Management	Conformance	The Entity's system defines the retention time as a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has reported to ASI the Input and Output Quantities of CoC Material/s over the calendar year within three months after the end of each year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has not received Input from Post-Consumer Scrap to date and therefore Eligible Scrap was not reported to ASI. However, the existing Entity's Material Accounting System is suitable for this reporting type.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The quantities of Inflow and Outflow of Non-CoC Material/s to and from the Entity over the calendar year are presented in the annual report to ASI.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has reported data to ASI on the maximum Positive Balance in the calendar year carried over to the following Material Accounting Period.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has implemented a system for reporting the used Positive Balance to ASI.

CRITERION	RATING	COMMENT
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has reported data on the Internal Overdraw in the calendar year to ASI. There has been no Internal Overdraw.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has implemented a system for reporting the Intra-Entity Flows to ASI.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
2.5 Error (Outsourcing Contractor)	Not Applicable	The Criterion is not applicable to the Entity as it does not use Outsourcing Contractors and therefore are not included in the Entity's Certification Scope.
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Conformance	The Entity's Material Accounting System ensures the production of ASI Bauxite only from the bauxite mine that is within the Entity's CoC Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity's Material Accounting System ensures the production of ASI Bauxite only from the bauxite mine that is Certified against the ASI Performance Standard.
3.1c ASI Bauxite (Bauxite sourcing)	Conformance	The Entity's Material Accounting System ensures the exact identification and the amount and the source of ASI Bauxite.

CRITERION	RATING	COMMENT
3.2a ASI Alumina (CoC Certification Scope)	Conformance	The Entity's Material Accounting System ensures the production of ASI Alumina only from the Alumina refiners that are within the Entity's CoC Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity's Material Accounting System ensures the production of ASI Alumina only from Alumina refiners that are Certified against the ASI Performance Standard.
3.2c ASI Alumina (Bauxite sourcing)	Conformance	The Entity's Material Accounting System ensures the exact identification of the amount and source of incoming ASI Bauxite.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from the Aluminium smelter that is within the Entity's CoC Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from Aluminium smelters that are within the Entity's CoC Certification Scope. The Entity does not require ASI Aluminium produced from smelters other than its smelting Facilities.
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity's Material Accounting System ensures exact accounting of both the amount and sourcing of ASI Alumina.

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity's Recycled Aluminium producing system ensures that ASI Aluminium is produced only from Facilities within the Entity's CoC Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity's Recycled Aluminium producing system ensures that ASI Aluminium is produced only from Facilities that are Certified against the ASI Performance Standard.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity's Material Accounting System ensures that Eligible Scrap is accounted as Pre-Consumer Scrap that is designated as CoC Material supplied directly from the CoC Certified Entity.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity's Material Accounting System ensures that the Scrap is subject to supplier Due Diligence and can be adequately assessed by the Entity to be Post-Consumer in origin.
4.2c Eligible Scrap (Dross)	Conformance	The Entity's Material Accounting System ensures that the Dross is subject to supplier Due Diligence and can be adequately assessed by the Entity.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity's Material Accounting System ensures the proper recording of the identity, principles and place/s of operation of all direct suppliers of Recyclable Scrap Material.
4.3b Records Management for Direct Suppliers of	Conformance	There are no cash transactions between the Entity and its suppliers. However, the spreadsheet for date recording of all financial transactions with direct suppliers of Recyclable Scrap Material, ensures that cash payments, if made, are within the lower of the

CRITERION	RATING	COMMENT
Recyclable Scrap Material (Financial transactions)		relevant defined financial threshold under Applicable Law or US\$10,000 (or equivalent), where the transaction is undertaken in a single operation or in several operations that are associated.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from Casthouses that are within the Entity's CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from Casthouses that are Certified against the ASI Performance Standard.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	All Aluminium smelters producing Primary Aluminium also have foundries that produce final products. ASI Aluminium for use in foundries is not purchased directly from other suppliers, nor through Traders.
5.2 Unique Identification	Conformance	The Entity's Material Accounting System has been tested and ensures that unique identification numbers, printed with ASI Aluminium, are linked to the Input Quantity of CoC Material.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from the Post-Casthouse Facility within the Entity's CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity's Material Accounting System ensures the production of ASI Aluminium only from Facilities that are Certified against the ASI Performance Standard.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's Material Accounting System ensures exact accounting of both the amount and sourcing of ASI Aluminium.
7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has developed, adopted and communicated a Responsible Sourcing Policy: https://rusal.ru/en/sustainability/approaches/ This also considers Criterion 1.2 (Anti-Corruption) in the ASI Performance Standard which relates to the main suppliers of Bauxite and Alumina.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has developed, adopted and communicated a Responsible Sourcing Policy: https://rusal.ru/en/sustainability/approaches/ This also considers Criterion 2.4 (Responsible Sourcing) in the ASI Performance Standard which relates to the main suppliers of Bauxite and Alumina.

CRITERION	RATING	COMMENT
7.1c Responsible Sourcing Policy (Human Rights Due Diligence)	Conformance	The Entity has developed, adopted and communicated a Responsible Sourcing Policy: https://rusal.ru/en/sustainability/approaches/ This also considers Criterion 2.4 (Responsible Sourcing) in the ASI Performance Standard which relates to the main suppliers of Bauxite and Alumina.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has developed, adopted and communicated a Responsible Sourcing Policy: https://rusal.ru/en/sustainability/approaches/ This also considers Criterion 9.1 (Human Rights Due Diligence) in the ASI Performance Standard which relates to the main suppliers of Bauxite and Alumina.
7.2 Risk Assessment and Mitigation	Conformance	The Entity has assessed the risks of non-compliance with its Responsible Sourcing Policy by its suppliers of Non-CoC Material, documents the findings, and undertakes measurable risk mitigation where risks of adverse impacts are identified.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established a complaints mechanism that is appropriate to the nature, scale and impact of the business. This allows interested parties to voice concerns about non-compliance with its Responsible Sourcing Policy in its Aluminium supply chain: https://rusal.ru/en/suppliers

8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity's Management System includes a Material Accounting System that safeguards the integrity of CoC Material and Eligible Scrap Mass Balance within the Certification Scope.
8.2 Material Accounting Period	Conformance	The Material Accounting Period in the Entity's Material Accounting System is 12 months, commencing the first day of the calendar year.
8.3 Input and Inflow Quantities	Conformance	The Entity's Management System includes a Material Accounting System that records the Input Quantity and Inflow Quantity of CoC Material and Non-CoC Material, by mass.
8.4 Output Quantities of CoC Material	Conformance	The Entity's Management System includes a Material Accounting System that records the Input Quantity and to establish the Output Quantity of CoC Material and Non-CoC Material, by mass.
8.5 Indivisibility of CoC Material	Conformance	The Output Quantity of CoC Material, which may be a part of the total production volume, is designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Not Applicable	The Entity does not produce Pre-Consumer Scrap from its processing in order to designate the relevant proportion as Eligible Scrap.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System ensures that the production of CoC Material will not proportionally exceed the Input Percentage of the total CoC Material for the Material Accounting Period. The total Output of CoC Material does not exceed the Input Percentage of CoC Material.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Material Accounting System does not allow for the transfer of an Internal Overdraw to the next Material Accounting Period (calendar year).
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System does not allow the transfer of an Internal Overdraw to the next Material Accounting Period (calendar year).
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Material Accounting System does not allow the transfer of an Internal Overdraw to the next Material Accounting Period (calendar year).
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System provides for a 'carry over' of the Positive Balance of Output CoC Material at the end of a Material Accounting Period to the subsequent Material Accounting Period.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System ensures that the Positive Balance, generated in a single Material Accounting Period and carried over to the subsequent Material Accounting Period, will expire at the end of that subsequent Period, if not drawn down.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity's Material Accounting System ensures that the CoC Document accompanies each shipment, or the transfer of CoC Material dispatched to other CoC Certified Entities.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the Date of Issue of the CoC Document.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the Reference number for the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the identity, address and CoC Certification Number of the Entity issuing the CoC Document.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification Number.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the information of the Entity's responsible employee, who can verify the information in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include a statement confirming that 'The information provided in the CoC Document is in Conformance with the ASI CoC Standard'.

CRITERION	RATING	COMMENT
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the information on the Type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the information on the Mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's Material Accounting System ensures that CoC Documents include the information on the Mass of total Material in the shipment.
9.3a Sustainability Data (optional) – Carbon footprint	Not Applicable	The Criterion is not applicable, as the Entity does not specify information on the average (preferably cradle-to-gate) carbon footprint in the accompanying document, because it is not mandatory.
9.3b Sustainability Data (optional) – Origin information	Not Applicable	The Criterion is not applicable, as the Entity does not specify information on the origin of Aluminium in the accompanying document.
9.3c Sustainability Data (optional) – Recycled content	Not Applicable	The Criterion is not applicable, as the Entity does not specify information on the recycled content in the accompanying document.
9.3d Sustainability Data (optional) – Post-Casthouse ASI Certification status	Conformance	The Entity obtains relevant information and provides applicable Sustainability Data in the CoC Document for that CoC Material.
9.4 Supplementary Information (optional) – Objective evidence	Conformance	The Entity's Material Accounting System ensures that the Supplementary Information can be supported by Objective Evidence.
9.5 Verification of Information	Conformance	The Entity's Material Accounting System enables it to respond to reasonable requests for the verification of information in the CoC Documents, issued by the Entity.
9.6 Error (Shipping)	Conformance	The Entity's Material Accounting System includes documentation of the error, the agreed steps taken to correct it and where required, implements actions to avoid its recurrence.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has required procedures and routines to verify that all required information in the received CoC Documents has been included.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity's Material Accounting System includes verification of the consistency of received CoC Documents with the accompanying CoC Material, before recording information in the Entity's Material Accounting System.

CRITERION	RATING	COMMENT
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity's Material Accounting System can verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material.
10.4 Error (Reception)	Conformance	The Entity's Material Accounting System can correct any error discovered after the CoC Material has been received and then implements actions to avoid a recurrence.

11. CLAIMS AND COMMUNICATIONS

11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has implemented the ASI Claims Guide. This document has been introduced to the Entity's facilities and the personnel involved have received training on its implementation. The Entity is currently not using ASI Claims.
11.1b Claims and Communications (Verifiable evidence)	Conformance	Any ASI statements must be agreed with the ASI senior Management Representative of the Entity. All statements are made in accordance with the accepted guidelines for the use of ASI Claims.
11.1c Claims and Communications (Employee training)	Conformance	Appropriate training has been provided for relevant Entity specialists. These specialists are aware and competent in making claims and/or representations about CoC Material outside of CoC Documents the Entity

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 June 2019	Initial Certification Audit – Full Certification
1	8 December 2020	Updated to reflect Certification Scope Change with addition of PJSC RUSAL Bratsk, JSC Boguchansk Aluminium Smelter, JSC RUSAL Krasnoyarsk, JSC RUSAL Sayanogorsk and Kubikenborg Aluminium AB. Post-Casthouse as a supply chain activity was also removed.
2	12 July 2021	Surveillance Audit
3	17 January 2022	Scope Change Audit – Certification Scope updated to include sites Aughinish Alumina (AAL), RUSAL Kandalaksha (KAZ), Sayanal and Armenal; and the Supply Chain Activity Post-Casthouse.
4	4 July 2022	Re-Certification and Scope Change Audit – Full Certification. Scope Change to include the supply chain activity of 'Aluminium Re-melting/Refining'.

5	28 February 2023	Text amendment – Corrected the Audit Scope for the Re-Certification Audit and Scope Change to include PJSC RUSAL Bratsk (BrAZ).
6	20 December 2023	Re-Certification and Scope Change Audit from Chain of Custody Standard V1 to V2. Change of Accredited Auditing Firm from DNV Business Assurance Services UK Ltd. to Bureau Veritas Certification. Certification Scope updated to include the following sites: Aluminium Rheinfelden Alloys, Rheinfelden Semis, RUSAL Novokuznetsk, RUSAL Taishet and RUSAL Volgograd.
