

The client for certification is an valid member of Aluminium Stewardship Initiative (ASI) in the "Production and Processing" or "Industrial Users" classes as defined in the applicable ASI Performance Standard requirements for at least one facility or one product/program. The client for certification accepts and works according to the ISEAL Alliance Code of Good Practice.

An assessment based on the ASI Standards consists of three audit main stages: Pre-audit planning, audit conduct and Post-Audit follow-up and reporting.

The current ASI documents are always valid for the audit.

The auditors are selected by the Head of the Certification Body of TÜV NORD CERT GmbH in accordance with their appointments for the particular standard and their qualification.

The complete assessment consists of the three aforementioned main audit stages. The audit itself is usually carried out at the customer's site.

1. Pre-Audit Planning

a. Initial communication

Prior to the audit a series of information and details is discussed with the client. Those include but are not limited to

- ASI membership status in *elementAI*: <u>https://aluminium-stewardship.knack.com/asi-assurance-platform/#member-login</u>
- ASI Membership classes and supply chain activities
- Agreement on ASI certification scope and objectives
- Kind of certification against ASI Performance Standard and / or ASI Chain of Custody Standard
- External certification schemes and parallel initiatives, for instance ISO 37001, ISO 14001, SA 8000, OHSAS 18001, verified GRI G4 report, ISO 37001
- Material Stewardship criteria in the ASI Performance Standard
- Date and timing of the audit
- Size and composition of the audit team
- Logistics
- Availability of the client's key personnel
- Access to documentation
- Pre-audit visits

b. Commercial arrangements

Based on the information gathered during the initial communication period a proposal is prepared and sent to the client. The proposal describes the client's as well as the CAB's responsibilities and general verification process.

c. Gather and review information

ASI Members are required to conduct a Self Assessment against the applicable ASI Standard for the relevant Certification Scope, prior to the Certification Audit.

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The client provides relevant information for the planning of the on-site audit. Relevant information includes but is not limited to:

- Risk-based Assurance Approach
- ASI Self Assessment
- Organisational information
- Stakeholder lists
- Description of products and processes
- Relevant management system procedures

On client request a pre-audit visit (not Self Assessment) to gather further information can be performed. Such a pre-audit visit is not mandatory and should be agreed upon in the proposal.

d. Defining the audit scope

The audit scope is discussed during the initial communication phase and is further evaluated after contractual arrangements have been set and further information on the client's processes have been gathered. The audit scope defines the extent and boundaries of the audit. The audit scope ultimately depends on

- Overall Maturity Rating (for next Surveillance Audit and Re-Certification)
- Facilities and criteria which may have had less attention in the previous audit(s)
- Non-conformances from previous audit(s)
- Changes to the client's certification scope
- Changes to the client's business or organizational structure

e. Audit team

An audit team can consist of one or more persons who meet the quality requirements of TÜV NORD CERT and the ASI. Generally a team consists of a lead auditor and a technical expert. Persons acting as ASI auditors must be suitably qualified, ASI accredited and trained and have knowledge of practices and processes of the client's business.

f. Development of the audit plan

The audit plan is prepared based on the defined audit and certification scope and the information gathered during the pre-audit planning process. It structures the on-site audit and informs auditors and clients about the content and timetable. Thus, the client can prepare the audit and embed it into the normal business processes. The audit plan is a flexible document and can be changed at any time on auditor's request.

The audit plan is submitted to the client with adequate notice prior to the audit.

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2. Audit conduct

a. Opening Meeting

During the opening meeting, the purpose of the assessment, the certification scope and methodology as well as the required documentation are reviewed. Apart from the audit team, at least the client's responsible person(s) for ASI certification are present.

The opening meeting serves to:

- Introduce the audit team
- Confirm the purpose and scope of the audit
- Review the agenda
- Provide an overview of methods and procedures used during the audit
- Arrange appointments with relevant personnel
- Explain the confidential nature of the audit process
- Answer questions from the client
- Behaviour in critical breach situations

b. Auditing Process

The criteria to be examined in the audit are derived in detail from the applicable requirements of the ASI Performance Standard and ASI Chain of Custody Standard.

The auditing process focuses on obtaining and evaluating objective evidence regarding compliance with the ASI Standards. Objective evidence may include, but is not limited to documentation, observations or testimonials of the client.

The period of records and documentary evidence depend on the kind of audit to be performed.

Generally, the certification will not be performed as holistic verification of all evidence but uses sampling methods to access enough evidence to verify that systems and processes are in place and effective. When sampling evidence, the following steps apply:

- Determination and review of the objective of the particular criteria in the standard
- Identification of the population of information that is available
- Selection of a sampling method
- Determination of an appropriate sample size
- Conduct of sampling
- Documentation of the results

Sampling sizes may differ according to overall population of evidence, company size or business activities.

c. Evaluation of the results

Based on the gathering of objective evidence during the auditing process the level of conformance with the requirements of the audited ASI Standards is evaluated. Each team member summarizes the findings and non-conformances within each assessed criterion of the ASI Standards. The rating of findings ultimately depends on the assessment of the audit team, however it will be discussed with the client. Furthermore the client is granted a transition period to adapt the processes according to the findings of the audit team.

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If a critical breach situation (Table 18 in ASI Assurance Manual) occurs during the audit process, the lead auditor notifies the client as well as the ASI Secretariat. In such a case the audit process will be suspended until further communication between client, audit team and ASI Secretariat.

All Non-Conformances are documented according to the requirements of the ASI Assurance Manual including:

- A reference to the Criterion and its requirements
- The nature of the Non-Conformance and its cause
- A brief description of the relevant and verified objective evidence for the Non-Conformance rating

As a result of the certification audit, the Overall Maturity Rating is determined by the auditor. The Overall Maturity Rating is the criterion for determining the surveillance audits to be carried out until the next recertification audit.

d. Log of Non-Conformances

Each finding is rated according to a conformance rating scale as conformant, a minor non-conformance, a major non-conformance or as not applicable.

All Non-Conformances, whether Major or Minor, require the Entity to prepare and implement appropriate Corrective Action Plans. This may include both corrective and preventive actions: Corrective: an action implemented to - remediate or make good the effects or harm resulting from the Non-Conformance or incident, and eliminate the cause of a Non-Conformance or an incident, in order to prevent a recurrence

Preventive: an action implemented to *prevent* the occurrence of a Non-Conformance or an incident.

e. Recommendations and suggested business improvements

Recommendations are purely for informative purposes and are non-binding to the client. However, the client needs to take action for the correction of all non-conformances regarding the ASI Standards requirements.

f. Closing Meeting

During the closing meeting, the observations and conclusions of the assessment are recapped. Apart from the audit team, at least the client's responsible person(s) for the ASI certification are present. A short closing meeting shall be held at each site in case of multi-site assessments, before the assessment is closed with a more comprehensive recap of all observations and conclusions with all responsible personnel.

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3. Post-Audit Follow-up and Reporting

a. Approving a Corrective Action Plan for Major Non-Conformances

If Non-Conformances occur during the audit, the client is granted provisional certification. For all Non-Conformances the audit team verified that the corrective actions

- Address the root cause of the Non-Conformance
- Prevent a recurrence of the finding
- · Are realistic and fitting

b. Reporting

The audit report summarizes the findings, conclusions and the client's conformity level with ASI Standards requirements. The report is generated using the ASI Assurance Platform. The report content is specified in section 8.16 f. of the ASI Assurance Manual.

c. Post Audit Verification closure of Major Non-Conformances

The implementation and effectiveness of corrective actions is verified by the ASI Accredited Auditor that issued the Non-Conformance in a post audit verification procedure. This procedure is performed on site or as desk review in coordination with the client.

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