



# Guidance Notes for Primary Aluminium Brands

## LME Brand Listing Requirements

# 1 Brand Listing Requirements

- 1.1 Primary aluminium producers wishing to apply for LME brand registration will only be considered if they satisfy the following criteria (the “Core Listing Requirements”):
  - (a) The producer has been in business for a minimum of 12 months.
  - (b) The production plant has been in production for a minimum of 12 months or, if in the opinion of the LME aluminium committee, adequate production capacity utilisation and satisfactory quality has been achieved at an earlier date.
  - (c) The production plant has the capacity to produce a minimum of 25,000mt per annum of aluminium.
- 1.2 The producer is required to choose a Brand Lister or Category 1-4 Member to process their brand application (see Rulebook Part 7, Rule 1) on their behalf. Thereafter, all correspondence will be via the selected Brand Lister or selected Member.
- 1.3 Production from more than one production plant must be separately listed. Each production plant must have a different brand name.
- 1.4 Producers will be required to comply with the LME’s Policy on Responsible Sourcing of LME-Listed Brands.
- 1.5 The application is two stages, and all documentation must be submitted in English.
- 1.6 The LME and LME Clear (“LMEC”) reserve the right to discuss without restriction, any information provided with any regulatory body; any third party provider of KYC, screening or other monitoring services; or any other persons or organisations, as the LME/LMEC may in their absolute discretion decide, and to make such other enquiries as they think fit (including using the information provided by the producer in such enquiries).
- 1.7 Payment of the brand listing fee is required at Stage One of the application process. The fee is US\$65,000 plus UK VAT and is non-refundable<sup>1</sup>.

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<sup>1</sup> Value Added Tax (“VAT”): under current UK legislation, the LME understands that Brand Listers and LME Members established in the UK submitting applications for their own production operations or for third party producers must pay UK VAT to the LME at the ruling rate at the time of application, regardless of domicile of the producer. Brand Listers and LME Members not established in the UK who submit applications do not have to pay UK VAT to the LME regardless of the location of the producer and production operations. This information is for guidance only and relevant parties should always seek their own advice. The LME will have no liability for reliance on the above.



## 2 Stage One

- 2.1 The producer is to supply the following information in a letter on its headed paper addressed to the LME (the "Application Letter"<sup>2</sup>):
- (a) The name of the Brand Lister or LME Member process its application.
  - (b) The full name and address of the producer of the brand to be listed by the LME.
  - (c) Brief details of the history of the producer.
  - (d) Details of the ownership of the producer.
  - (e) The address of the production plant.
  - (f) The name of the brand subject of the application.
  - (g) The first date of production from which the producer guarantees the brand as meeting the relevant chemical specification.
  - (h) The design capacity (mt).
  - (i) The current annualised use of capacity (mt).
  - (j) The monthly production figures for the most recent 12 months.
  - (k) The shape(s) to be listed; ingots, t-bars, sows.
  - (l) The name of two testers the producer intends to use for testing (Stage Two). The testers nominated must be from the list of LME Approved Testers of Primary Aluminium provided at appendix E of the Guidance Notes. The producer will need to include evidence of the testers' willingness to test with its application<sup>3</sup>.
  - (m) The names of two LME Listed Samplers and Assayers ("LSAs") the producer intends to use to evaluate the quality of its brand (Stage Two). One LSA should be nominated to undertake sampling and analysis and one LSA should be nominated to undertake analysis only<sup>4</sup>.
- 2.2 The following information and documentation (the "Additional Listing Requirements") is to be provided by attachment to the Application Letter:
- (a) The following financial information:
    - (i) The latest three consecutive profitable externally audited financial statements of the producer, where available;
    - (ii) In the event the producer cannot provide three consecutive profitable externally audited financial statements, the parent company of the producer must provide three consecutive

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<sup>2</sup> The Application Letter must be signed and dated. The signatory should state their position within the producer company.

<sup>3</sup> The LME aluminium committee will provide approval of the nominated testers as part of Stage Two.

<sup>4</sup> The LME aluminium committee will provide approval of the nominated LSAs as part of Stage Two.

profitable externally audited financial statements and a signed Letter of Support<sup>5</sup> regarding the financial position of the producer<sup>6</sup>.

- (iii) Confirmation there has been no restructuring of the producer over the last three years and there is no ongoing restructuring; and
- (iv) Evidence that the capital net worth of the producer<sup>7</sup> is a minimum of US\$ 2 million.

(b) A copy of the incorporation certificate of the producer.

(c) Details of the product as follows:

**Ingots**

- (i) Photographs of an ingot showing the brand name, production cast reference and any other markings and/or symbols on the metal.
- (ii) Provide a sample label with the application if used. Labels used must be durable and plasticised.
- (iii) Photographs of a strapped bundle from top and side dimensions.
- (iv) Drawings of the ingot and a bundle showing all dimensions in mm and weights in kg including how many ingots in a bundle.
- (v) The following statements must be added to the drawings:
  - Each bundle is securely strapped in two dimensions with material protected against corrosion and of sufficient strength and fixing to permit safe handling by forklift truck without bundle distortion and breakage.
  - The bundle size and shape is suitable for safe and secure stacking; and
  - The bundle assembly and security is such that on removing the security straps it remains an integral free-standing bundle.

**T-bars and sows**

- (i) Photographs of the shape(s) from top and side dimensions showing the brand name, production cast reference and any other markings and/or symbols on the metal.
- (ii) Provide a sample label if used with the application. Labels used must be durable and plasticised.
- (iii) Drawings of the shape(s) showing all dimensions in mm and weight in kg.

(d) A Letter of Undertaking dated and signed on behalf of the producer<sup>8</sup>.

(e) An outline of the production process including a process flow diagram.

(f) A production site plan/diagram.

(g) A paper detailing the sampling and analytical process, including stating the detection levels that are used for evaluating impurities and advising if any of the sampling and analytical work is outsourced.

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<sup>5</sup> In accordance with the draft appended to these Guidance Notes – Appendix A.

<sup>6</sup> The LME reserves the right to require a signed Letter of Support from the parent company of a producer in such circumstances regarding the financial position of the producer as it, in its absolute discretion, considers appropriate.

<sup>7</sup> The capital net worth of the producer shall be determined on the basis of the permanent capital plus additional capital disallowables. In particular, permanent capital shall be issued and fully paid ordinary shares, issued and fully paid preference shares, share premium and other reserves not available for distribution. A deficit in reserves available for distribution will be deducted when calculating permanent capital. Additional capital shall be considered other equity reserves (distributable or otherwise) and profit and loss reserves. Further, disallowable items are considered intangible fixed assets such as goodwill, development costs etc., investments in subsidiaries and/or other group companies.

<sup>8</sup> In accordance with the draft appended to these Guidance Notes – Appendix B.

- (h) Chemical analysis data for the most recent three months.
- (i) A copy of ISO 9001 certificate, or, alternative, that of ISO/TS 16949.
- (j) Fulfilment of the LME's Policy on Responsible Sourcing of LME-Listed Brands<sup>9</sup>:
  - (i) Evidence of compliance with one of the four LME tracks:
    - Track A – Recognised Alignment-Assessed Standard;
    - Track B – Audited LME RFA;
    - Track C – Published LME RFA;
    - Track D – Secondary Materials.
  - (ii) A copy of ISO 14001 certificate or equivalent.
  - (iii) A copy of ISO 45001 certificate or equivalent.
- (k) Fulfilment of the electronic Certificate of Analysis ("eCoA") requirements<sup>10</sup>.
  - (i) Connect to LMEpassport to create enhanced eCoA records for all LME eligible metal<sup>11</sup>.
  - (ii) Provide a sample Certificate of Analysis which must be in English/dual language and include the date, name and address of the producer, brand name, production cast reference and associated chemical analysis<sup>12</sup>.
- (l) Fulfilment of the LME's CBAM requirement.
  - (i) Complete the LME emissions reporting form (Excel)<sup>13</sup>.

2.3 It is the producer's responsibility to ensure that the information in their application complies with Part 6 of the LME Rulebook – Special Contract Rules for High Grade Primary Aluminium and to ensure that no testing takes place (Stage Two) until approval to do so is provided by the LME.

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<sup>9</sup> For a more detailed understanding of the responsible sourcing requirements for brand listing, please see the LME's Policy on Responsible Sourcing of LME-Listed Brands and the dedicated webpage: [Responsible sourcing | London Metal Exchange](#).

<sup>10</sup> For a more detailed understanding of the eCoA requirements, please see Appendix C to these Guidance Notes.

<sup>11</sup> Producers may proceed to Stage Two at its own risk whilst in the process of connecting to LMEpassport, but connection to LMEpassport must be achieved before its brand can be listed.

<sup>12</sup> Certificates of Analysis should demonstrate compliance with the relevant chemical specification by showing actual analysed content of the metal.

<sup>13</sup> Producers will be required to upload its LME emissions reporting form to LMEpassport once its brand listed. For a more detailed understanding of the LME's CBAM requirements please see the dedicated webpage: [LME CBAM emissions reporting | London Metal Exchange](#).

### 3 Stage Two

- 3.1 On receipt of all information and documentation detailed in Stage One, the LME will request such additional information and documentation as required.
- 3.2 Subject to the application meeting Stage One of the brand listing requirements, the application is circulated to the LME aluminium committee for approval for the application to proceed to quality testing.
- 3.3 The LME will inform the producer of the testing programme which is normally 2 x 50mt from a minimum for four production batches (1 x 50mt to each tester)<sup>14</sup> and a 28-day application to list notice is issued.
- 3.4 The LME will write directly to the testers and LSAs advising them of the requirements for quality testing for the application. The testing and sampling and analysis shall be accordance with the LME's instructions and procedures and all test and LSA reports should be sent directly to the LME.
- 3.5 Sampling of the test lots shall be carried out by the nominated LSA at the testers' site and/or the producer's production plant<sup>15</sup>.
- 3.6 The producer and/or Brand Lister or LME Member will be responsible for liaising with the testers and LSAs for the arrangements for testing.
- 3.7 The producer is required to provide the LME with its chemical analysis data for test lots.
- 3.8 The LME reserves the right to require testing to be extended, if in its sole opinion, such action is necessary for evaluation of the brand. Any additional or extending testing will be for the cost of producer.
- 3.9 Subject to the receipt of satisfactory reports from the testers and LSAs, the reports are circulated to the LME aluminium committee for approval to list the brand, followed by internal executive approval and the issuance of the listing notice for the brand.
- 3.10 The LME reserves the right to audit a producer's plant at any time prior to or post the listing of a brand for verification of any aspect of the process at the cost of the producer.
- 3.11 From time to time, the LME will request that producers of a listed brand(s) re-affirm the undertakings originally given at the time of listing. Failure to comply with the undertakings or supply evidence of continuing compliance with the brand listing requirements and Part 6 and Part 7 of the LME Rulebook may result in the suspension or delisting of the brand(s). If the producer fails to notify the LME promptly of any change in the information supplied with the original application, or if any such changes, are in the LME's view material, then the LME may suspend or delist the brand(s).
- 3.12 The listing of a brand is also subject to the provisions of Rules 3 to 7 of Part 7 of the LME Rulebook.

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<sup>14</sup> The testing programme is subject to change at the discretion of the LME and LME aluminium committee.

<sup>15</sup> The producer will need to advise the LME in its application if there is any reason the sampling and analysis of its brand needs to place at its plant in lieu of sending 2 x 50mt to two testers.

## 4 Appendix A – Draft Letter of Undertaking

This letter must be issued by the producer on headed paper, signed and dated, and show the signatory's position.

London Metal Exchange  
10 Finsbury Square  
London  
EC2A 1AJ  
UK

Attention – Sustainability and Physical Market Operations

*(INSERT DATE)*

In consideration of the LME maintaining our Primary Aluminium brand (*insert brand name*) in its list of brands deliverable in fulfilment of its High Grade Primary Aluminium contract:

1. We (*insert producer name*) undertake that the quality of our primary aluminium brand (*insert brand name*) produced at (*insert name and address of production plant*), will meet with the requirements of the LME contract for High Grade Primary Aluminium and conform to the registered designation Al99.70 in the GB/T 1196-2017 standard entitled “Unalloyed Aluminium Ingots for Remelting” or Primary Aluminium with impurities no greater than in the registered designation P1020A in the Registration Record of Aluminum Association Designations and Chemical Composition Limits for Unalloyed Aluminum of the Aluminum Association Inc., U.S.A. (2018) and its quality will be maintained in accordance with the lots supplied for testing.
2. We also undertake that any complaints we may received with regard to the quality will be investigated without any restriction on the period within which such a claim be made.
3. We undertake that we will not attempt to restrict (*insert brand name*) brand from being delivered against the LME Contract.
4. We further undertake that any change in ownership, financial status, production practice or any other material circumstance will be advised to the LME without delay and to comply with Rules 3 to 7 inclusive of Part 7 of the LME Rulebook, any amendments thereto and any Notices issued by the LME.
5. This letter of undertaking is governed by English law. The courts of England shall have non-exclusive jurisdiction to settle any disputes in relation to this letter of undertaking.

Yours sincerely

Signature.....

Name.....

Company name.....

Position in company.....

## 5 Appendix B – Draft Parent Company’s Letter of Support

This letter must be issued by the producer’s parent company on headed paper, signed and dated, and show the signatory’s position.

London Metal Exchange  
Physical Operations Department  
10 Finsbury Square  
London  
EC2A 1AJ  
UK

Attention – Sustainability and Physical Market Operations

*(INSERT DATE)*

In consideration of *(insert applicant producer’s name)*’s application for the listing of *(insert brand name)* by the LME, in its list of brands deliverable in fulfilment of the LME’s High Grade Primary Aluminium contract, we, *(insert parent company’s name)*, undertake that *(applicant producer’s name)* is of good financial standing.

We acknowledge that as *(insert applicant producer’s name)* has not produced *(insert brand name)* for a period of three years, *(insert applicant producer’s name)* is currently unable to satisfy the financial criteria in full for LME brand registration. As *(insert parent company’s name)* is the *(insert description of the corporate relationship i.e. majority shareholder)* of *(insert applicant producer’s name)*, we can confirm that we support *(insert applicant producer’s name)*’s application and that we will provide financial support to *(insert applicant producer’s name)* where such support may be required in order to ensure that *(insert applicant producer’s name)* remains of good financial standing.

We further undertake that *(insert applicant producer’s name)* will inform the LME without delay of any change in its ownership, financial status, production practice or any other material circumstances that may affect the good financial standing or reputation of *(insert applicant producer’s name)* and/or *(insert brand name)*.

This letter of support shall be governed by English law. The courts of England shall have non-exclusive jurisdiction to settle any disputes in relation to this letter of support.

Yours sincerely

Signature.....

Name.....

Company Name.....

Position in company.....

## 6 Appendix C – eCoA Requirements

### 6.1 What is LMEpassport?

LMEpassport is the LME’s central digital depository for Certificates of Analysis (CoAs”). It replaces traditional paper CoAs or PDF records with electronic CoAs (“eCoAs”), mitigating the risk of physical document loss or damage during global transit. The use of LMEpassport become a mandatory requirement for all producers of LME-listed primary aluminium brands in October 2024 and for all producers of LME-listed aluminium alloy, lead, zinc, nickel, tin and cobalt brands in October 2025.

### 6.2 What does this mean for producers?

For metal of LME-listed primary aluminium brands to be placed on warrant, they must be accompanied by an eCoA. Therefore, producers must connect to LMEpassport and upload eCoAs for all LME-eligible material. This requirement applies to all production of an LME-listed brand whether it is intended for delivery into an LME warehouse.

### 6.3 How to connect?

- (a) There are two ways a producer can connect to LMEpassport for the purpose for creating and managing eCoAs (enhanced records).
  - (i) Application Programming Interface (“API”) connection – recommended for its efficiency, scalability and automation;
  - (ii) Excel workbook upload – a manual alternative for data entry.
- (b) Producers are strongly encouraged to adopt API connection to streamline the eCoA process.
- (c) Onboarding and establishing a connection to LMEpassport typically requires 2-3 months. To avoid any delays to the application process, producers should initiate the connection process as early as possible in the brand application process.

6.4 For additional information on LMEpassport please refer to the dedicated webpage: [LMEpassport | London Metal Exchange](#).

## 7 Appendix D – Bundle Strapping Specifications

7.1 Table 1 – Strapping specifications for all metals/bundled shapes for producers using steel strapping.

Strap	Size	Average strength (newtons)	Applied tension (newtons)	Joint	Joint strength	Working range elongation
Steel	19mm x 0.63mm	12,000	7,000	Seal-less	80%	0.1-0.3%
Steel	19mm x 0.63mm	12,000	5,000	Metal seal	80%	0.1-0.3%

7.2 Table 2 – Strapping specifications for primary aluminium, aluminium alloy, tin, lead and zinc ingots for producers using polyester strapping.

Strap	Size	Average strength (newtons)	Applied tension (newtons)	Joint	Joint strength	Working range elongation
Polyester	15.6mm x 0.9mm	6,000	3,500	Metal seal	60%	2-3.5%
Polyester	15.6mm x 0.9mm	6,000	2,500	Friction	80%	2-3.5%

7.3 Table 3 – Strapping specifications for copper and nickel full plate cathodes for producers using polyester strapping.

Strap	Size	Average strength (newtons)	Applied tension (newtons)	Joint	Joint strength	Working range elongation
Polyester	19.0mm x 1.0mm	1,000	3,500	Metal seal	60%	2-3.5%
Polyester	19.0mm x 1.0mm	1,000	2,500	Friction	80%	2-3.5%

7.4 Table 4 – Securing method for strapping

Tool	Strap material	Joint type	Maximum applied tension (newtons)	Joint strength
Manual	Steel	Metal seal	5,000	60%
Pneumatic	Steel	Seal-less	7,000	80%
Manual	Polyester	Metal seal	3,500	60%
Pneumatic	Polyester	Friction weld	2,500	80%

## 8 Appendix E – LME Approved Testers for Primary Aluminium Brand Applications

8.1 The following testers have been approved by the LME to receive and process the designated tonnage of metal of the brand subject to the application as part of Stage Two of the brand application process.

China	Contact
<b>Chalco Ruimin Co. Ltd</b> 9 Qingzhou Road Mawei District Fuzhou City Fujian Province China	<b>Ms Amanda Chen</b> Tel: +86 591 88028132 Email: <a href="mailto:chenlm@ruimin.com">chenlm@ruimin.com</a>
<b>Yunnan Aluminium Co Ltd</b> Yangzonghai Chenggong Yunnan China	<b>Mr Leo Wang</b> Tel: 86-871-7455889 Email : <a href="mailto:sales@ylgf.com">sales@ylgf.com</a> or <a href="mailto:leow.yl@gmail.com">leow.yl@gmail.com</a>

Germany	Contact
<b>Constellium Rolled Products Singen GmbH &amp; Co KG</b> Alusingen-Platz 1 D-78224 Singen Germany	<b>Ms Janette Knippenberg</b> Tel: +49 7731 80 2529 Email: <a href="mailto:Janette.Knippenberg@contellium.com">Janette.Knippenberg@contellium.com</a>
<b>Aluminium Norf GmbH</b> KoblenzerStrasse 120 41468 Neuss Germany	<b>Mr Uwe Peters</b> Tel: +49 21 31 937 83 15 Email: <a href="mailto:uwe.peters@alunorf.de">uwe.peters@alunorf.de</a>
<b>Trimet Aluminium SE</b> Aluminiumallee 1 D-45356 Essen Germany	<b>Mr Ilias Papadopoulos</b> Tel: +49 201 366-826 Email: <a href="mailto:papadopoulos@trimet.de">papadopoulos@trimet.de</a>
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Hungary	Contact
<b>Alcoa-Koefem Kft</b> Verseci u. 1-15 H8000 Szekesfehervar Hungary	<b>Mr Frank Bodenstein</b> <b>Alcoa Europe SARL</b> Avenue Guisepppe Motta 31-33 1202 Geneva Switzerland  Tel: +41 22 919 6111 Email: <a href="mailto:frank.bodenstein@alcoa.com">frank.bodenstein@alcoa.com</a>

India	Contact
<b>JSK Industries Pvt Limited</b> 9, A K Naik Marg C S T; Near Empire Cinema Mumbai – 400001. (India)	<b>Mr. Zimin A Doshi</b> <b>JSK Industries Pvt Limited</b> Works: 369/1/1/2 Behind Siyaram Silk Mills Limited Sayli. Silvassa – 396230. (India)  Tel: +9122 45407737 Mobile: +919869969656 Email: <a href="mailto:zimindoshi@jaskindia.in">zimindoshi@jaskindia.in</a>

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Norway	Contact
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Spain	Contact
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<p><b>ECN Cable Group SL</b>            Portal de Bergara, 36            Polig. Ind. Betono            01013 Vitoria-Gasteiz            Spain</p>	<p><b>Mr Antonio Rico</b>            Tel: +34 945 261 100            Email: <a href="mailto:arico@ecn.es">arico@ecn.es</a></p>

UK	Contact
<p><b>Alcoa Manufacturing (UK) Ltd</b>            Kitts Green Road            Kitts Green            Birmingham            B33 9QR            United Kingdom</p>	<p><b>Mr Frank Bodenstein</b>  <b>Alcoa Europe SARL</b>            Avenue Guiseppe Motta 31-33            1202 Geneva            Switzerland</p> <p>Tel: +41 22 919 6111            Email: <a href="mailto:frank.bodenstein@alcoa.com">frank.bodenstein@alcoa.com</a></p>
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UAE	Contact
<p><b>Trans Gulf Aluminium Industries Co LLC</b>            PO Box 83059            Jebel Ali Industrial Area 1            Dubai            UAE</p>	<p><b>Mr Abdul Cader</b>            Tel: +971 4 880 1524            Email: <a href="mailto:abdulcader@tggroup.ae">abdulcader@tggroup.ae</a></p>

USA	Contact
<p><b>Hydro Aluminium N.A.</b>            5801 Riverport Rd            Henderson            KY 42420            USA</p>	<p><b>Mr Christopher Summers</b>            Tel: +1 410 487 8151            Fax: +1 270 826 2345            Email: <a href="mailto:Christopher.Summers@hydro.com">Christopher.Summers@hydro.com</a></p>