

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTELLIUM

AS&I EXTRUSION SINGEN, AUTOMOTIVE STRUCTURES GOTTMADINGEN AND DAHENFELD

CERTIFICATE
NUMBER

112

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

29 JANUARY 2021

DATE OF EXPIRY

28 JANUARY 2024

CERTIFIED SINCE

29 JANUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

Extrusion plant of Constellium Singen (Germany) and
Automotive Structure production sites of
Gottmadingen (Germany) and Dahenfeld (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium AS&I Extrusion Singen, Constellium Automotive Structures Gottmadingen and Dahrenfeld
CERTIFICATION SCOPE	Extrusion plant of Constellium Singen (Germany) and Automotive Structure production sites of Gottmadingen (Germany) and Dahrenfeld (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (30 November – 1 December 2020)• Surveillance Audit (22 June 2022)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">• 30 November – 1 December 2020 (Initial Certification Audit)• 22 June 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 17 December 2020 (Initial Certification Audit)• 2 November 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 November – 1 December 2020)</u></p> <p>Includes the extrusion plant of Singen AS&I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the audit (November – December 2020), access to facilities was not possible, due to COVID-19 related travel restrictions. Those facilities were audited 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.</p>

Surveillance Audit (22 June 2022)

Includes the extrusion plant of Singen AS&I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.

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.

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

29 January 2021 – 28 January 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

28 January 2024

CERTIFICATE
NUMBER

112

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constellium (parent company of the audited Entity "Constellium Singen GmbH") is an active ASI Member (Production and Transformation group), and it has committed to ASI's membership obligations. Further information is available at: https://aluminium-stewardship.org/about-asi/asi-members/constellium
1.2 Management system	Conformance	As confirmed by document review and interviews, the Entity has established a Management System that addresses all applicable requirements of the Chain of Custody (CoC) Standard. It has implemented relevant Policies, systems, procedures, and processes. The Management System includes a robust Material Accounting System based on the Entity's Enterprise-Resource-Planning System.
1.3 Management system reviews	Conformance	The Entity has established a mechanism for the periodic review and update of the Chain of Custody Management System, in line with the other facets of its integrated Management System. The first review was conducted in February 2022.
1.4 Management representative	Conformance	At the group level, the Director of Group Sustainability oversees the implementation of and compliance with ASI requirements. Within the Entity, at each site, there is one person responsible for the implementation of the ASI CoC Standard. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has prepared and conducted Chain of Custody specific trainings for relevant personnel and has communicated CoC related information to all employees.
1.6 Record keeping	Conformance	The Entity has implemented procedures to maintain up-to-date records covering all applicable requirements of the ASI CoC Standard for more than the required 5 years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust. The first report was submitted in May 2022. It included Input and Output Quantities of CoC Materials over the calendar year.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust.

CRITERION	RATING	COMMENT
		The first report was submitted in May 2022. It included Input Percentages calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust. The first report was submitted in May 2022. It included information regarding the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has made provisions for annual reporting to the ASI Secretariat that are documented in a procedure. They are suitable and appear to be robust. The first report was submitted in May 2022. It included information regarding the maximum Internal Overdraw within the calendar year, and the percentage of Input Quantity of CoC Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Re-Melting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in producing Casthouse Products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity does not intend to use ASI Credits. This Criterion is therefore not applicable. All required data was reported.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.5 Error management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.

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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

CRITERION	RATING	COMMENT
5.1a CoC Certification Scope - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity's system is designed to ensure that it is producing ASI Aluminium only from Facilities that are within its own ASI CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity is Certified against the ASI Performance Standard, as can be verified on the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/constellium
6.1c Sourcing ASI Aluminium	Conformance	The Entity has defined that its Post-Casthouse Facilities shall only source ASI Aluminium from other ASI certified entities or via metal traders. At the time of the audit, ASI Aluminium had not yet been sourced.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has issued and communicated a Supplier Code of Conduct and a Responsible Supply Chain Management Policy, available in multiple languages on the Constellium website: https://www.constellium.com/reports-hub The Supplier Code of Conduct covers - Labour and Human Rights - Environment, Health, Safety and Energy - Business Ethics (Anti-Corruption) - and Sustainable Procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has issued and communicated a Supplier Code of Conduct and also a Responsible Supply Chain Management Policy, available in multiple languages on the Constellium website: https://www.constellium.com/reports-hub The Supplier Code of Conduct covers - Labour and Human Rights - Environment, Health, Safety and Energy - Business Ethics (Anti-Corruption) - and Sustainable Procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has issued and communicated a Supplier Code of Conduct and also a Responsible Supply Chain Management Policy, available in multiple languages on the Constellium website:

CRITERION	RATING	COMMENT
		<p>https://www.constellium.com/reports-hub</p> <p>The Code of Conduct covers: - Labour and Human Rights - Environment, Health, Safety and Energy - Business Ethics - and Sustainable Procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.</p> <p>The Constellium Policy on Responsible Supply Chain Management includes a Due Diligence requirement. This is complemented by Constellium's requirement to their metal suppliers to undergo an assessment by an independent third party.</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has issued and communicated a Supplier Code of Conduct and also a Responsible Supply Chain Management Policy, available in multiple languages on the Constellium website: https://www.constellium.com/reports-hub</p> <p>The Code of Conduct covers: - Labour and Human Rights - Environment, Health, Safety and Energy - Business Ethics (including Export/Import restrictions and regulations and sourcing of Conflict Minerals, Dodd Franck Act) and Sustainable Procurement. Suppliers are required to sign the Supplier Code of Conduct or equivalent.</p>
7.2 Risk assessment	Conformance	<p>The Entity has implemented and manages a risk-oriented, documented, Due Diligence process for its suppliers. This process includes the need for measurable risk mitigation in the event of an identified potential or actual adverse impacts. The process is described in the Constellium Responsible Supply Chain Management Policy, which can be accessed in multiple languages via the following link: https://www.constellium.com/reports-hub</p>
7.3 Complaints mechanism	Conformance	<p>The Entity has implemented a system to receive and handle feedback, including complaints and grievances of Stakeholders. The main means of contact are the webpage (https://www.constellium.com/contact) and the e-mail address (sustainability@constellium.com) are disclosed in the Supplier Code of Conduct.</p>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>The Entity's Management System includes a Material Accounting System that records the Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based on the Entity's Enterprise-Resource-Planning System.</p>
8.2a Post-Consumer Scrap	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Entity has specified in writing, that the Material Accounting Period in the Entity's Material Accounting System is 12 months starting from the first day of the calendar year.
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Entity uses the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material, by mass.
8.7 Output Quantity designation	Conformance	As written in the Entity's CoC procedure, the Entity has established that the Output Quantity of CoC Material is designated as 100% CoC Material.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	For Pre-Consumer Scrap produced by the Entity, the Input Percentage of the Material Accounting Period will be used to determine the Output Quantity of Eligible Scrap.
8.9 Outputs not exceed Inputs	Conformance	The Entity has implemented a procedure to check that the total Output of CoC Material does not proportionally exceed the Input Percentage as applied to the total Input of CoC Material over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure that max. 20% overdraw of the total Input Quantity of CoC Material will happen within the Material Accounting Period in case of force majeure.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by the force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period.

CRITERION	RATING	COMMENT
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is identified.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of Output CoC Material at the end of the Material Accounting Period will be carried over to the subsequent period and that such carry over will expire at the end of that period if not drawn down.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of the Entity's Chain of Custody related procedures, review of 'dummy' CoC Documents and interviews with personnel. The Entity will include CoC information in a separate accompanying document.
9.2a Date of issue	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Date of Issue.
9.2b Reference number	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a reference number.
9.2c Issuing Entity	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address, and CoC Certification Number of the Issuing Entity.
9.2d Receiving customer	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address, and CoC Certification Number of the receiving Entity.
9.2e Responsible employee	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the name of the responsible employee.

CRITERION	RATING	COMMENT
9.2f Conformance statement	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g Type of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Type of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of total Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Smelting, Aluminium Re-Melting/Refining or Casthouse operations. For the time being, Constellium does not provide Entity specific sustainability information to customers and therefore does not include data related to greenhouse gas emissions in CoC Documents. Sustainability Data for the group is available from the Constellium website: https://www.constellium.com/sustainability
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has decided to provide information about its ASI Certification Status for the ASI Performance Standard on its CoC Documents.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to include Supplementary Information on its CoC Documents.
9.5 Response to verification requests	Conformance	Relevant personnel have been trained and are aware of their duties under ASI CoC Standard. The system is robust to document verification requests, errors, corrective actions, and any potential preventive measures to meet the Chain of Custody Criteria.

CRITERION	RATING	COMMENT
9.6 Error management	Conformance	The Entity has defined in its ASI Management Procedure the way errors regarding CoC shipments shall be managed (documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence).
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has defined in a procedure the way to verify the received CoC Documents. A specific checklist is in use to ensure conformity with this Criterion of the ASI CoC Standard.
10.2 Verify consistency with shipments	Conformance	The Entity has defined in the ASI management Procedure how to verify the received CoC Documents and a specific checklist has been created to perform it. All deliveries are verified when entering the Facilities prior to being entered into the internal SAP System.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined a quarterly check of the validity and scope of the supplier's ASI CoC Certification.
10.4 Error management	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents as required by the ASI CoC Standard. Relevant staff have been trained accordingly. The Entity's approach to error handling for received CoC documents is the same as for issued CoC Documents. The Entity has defined in its ASI Management Procedure the way errors regarding CoC shipments shall be managed (including documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence).
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.
11.1d No Positive Balance of 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.

CRITERION	RATING	COMMENT
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 year maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. Until the time of the audit, the Entity did not make claims or representations about CoC material outside of CoC Documents.
12.1b Verifiable evidence	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. The Entity has demonstrated awareness that all ASI-related claims must be supported by verifiable evidence. There have been no claims made about CoC Material outside of CoC Documents at the time of the audit.
12.1c Employee training	Conformance	The Entity has trained relevant employees regarding ASI claims and representations.

Document Control and Version History

Revision	Date	Notes
0	29 January 2021	Initial Certification Audit - Full Certification
1	9 November 2022	Surveillance Audit