

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ALUFLEXPACK NOVI D.O.O. (DRNIŠ) AND PROCESS POINT SERVICE AG (EINSIEDELN)

CERTIFICATE
NUMBER

155

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

13 OCTOBER 2021

DATE OF EXPIRY

12 OCTOBER 2024

CERTIFIED SINCE

13 OCTOBER 2021

AUTHORISED BY

A handwritten signature in white ink, consisting of a stylized 'J' followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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

Aluflexpack core business activity is production of flexible packaging and conversion of aluminium foil, paper and flexible films at the production sites Driš (Croatia) and Einsiedeln (Switzerland).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Aluflexpack
ENTITY NAME	Aluflexpack Novi d.o.o. (Drniš) and Process Point Service AG (Einsiedeln)
CERTIFICATION SCOPE	Aluflexpack core business activity is production of flexible packaging and conversion of aluminium foil, paper and flexible films at the production sites Drniš (Croatia) and Einsiedeln (Switzerland).
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
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	20 – 22 July 2021
AUDIT REPORT SUBMISSION	10 September 2021
AUDIT SCOPE	<p>The audit scope includes the production of flexible packaging and conversion of aluminium foil, paper and flexible films at the production sites Drniš (Croatia) and Einsiedeln (Switzerland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p>At the time of the audit (September 2021), access to the Einsiedeln site was not possible, due to COVID-19 related travel restrictions. The audit at 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.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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

13 October 2021 – 12 October 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

12 April 2023

CERTIFICATION
NUMBER

155

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Aluflexpack AG (Owner of Aluflexpack Novi d.o.o. which has 4 plants in Croatia, including the Drniš site and parent company of Process Point Service AG), are part of the industrial group Montana Tech Components. Aluflexpack is an active ASI Member (Production and Transformation class) and it has committed to ASI's membership obligations. For further information please check the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/aluflexpack/
1.2 Management system	Conformance	The Entity has developed and implemented systems and processes that conform to ASI Performance Standard's legal compliance requirements. The General Manager takes overall responsibility for legal compliance. There are systems in place (e.g. a legal database and qualified legal advisers) to maintain awareness of and to ensure compliance with Applicable Law. The Entity holds an ISO 14001 certificate from an accredited certification body to ensure compliance with applicable environmental law.
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.
1.4 Management representative	Conformance	Aluflexpack Novi's Quality Assurance Manager is in charge of the implementation of and compliance with ASI CoC Standard requirements. Within the Entity, there is a team assisting this role in the implementation of the ASI Chain of Custody Standard per site. 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 Standard specific training to relevant personnel and has communicated CoC Standard related information to all employees.
1.6 Record keeping	Conformance	The Entity has implemented a procedure to maintain records covering all applicable requirements of the ASI Chain of Custody Standard for at least the required 5 year period.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are documented in a procedure.

CRITERION	RATING	COMMENT
		<p>They are suitable and appear to be robust. Reporting will include Input and Output Quantities of CoC Materials over the calendar year.</p> <p>Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.</p>
1.7b Reporting to ASI (Input Percentage)	Conformance	<p>The provisions of the Entity for Annual Reporting to the ASI Secretariat are documented in a procedure. They are suitable and appear to be robust. Reporting will include Input Percentages calculated for the calendar year.</p> <p>Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.</p>
1.7c Reporting to ASI (Positive Balance)	Conformance	<p>The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.</p> <p>Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.</p>
1.7d Reporting to ASI (Internal Overdraw)	Conformance	<p>The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.</p> <p>Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.</p>
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	<p>This Criterion is not applicable, as the Entity is not engaged in Aluminium Re-Melting/Refining to produce Recycled Aluminium.</p>
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	<p>This Criterion is not applicable, as the Entity is not engaged in producing Casthouse Products.</p>
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	<p>The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include quantity of ASI Aluminium allocated to ASI Credits in the calendar year, if applicable.</p> <p>Note 1: For the time being, the Entity does not intend to use ASI market credits.</p> <p>Note 2: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.</p>

CRITERION	RATING	COMMENT
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable, as the Entity does not outsource CoC Material to Contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.5 Error management	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
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.

CRITERION	RATING	COMMENT
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		
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 itself producing ASI Aluminium only from facilities which are within its own ASI CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	Aluflexpack's Drniš site is certified against the ASI Performance Standard, as can be verified on the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/aluflexpack/ Process Point Service AG is not yet certified against the ASI Performance Standard, however such audit is already scheduled for a point of time which is within the required period after ASI CoC Certification.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has defined that its Post-Casthouse facilities shall only source ASI Aluminium from other internally approved ASI Certified Entities. At the time of 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 communicated its own Code of Conduct to suppliers of Non-CoC Material and requests that their suppliers adhere to this code or

CRITERION	RATING	COMMENT
		<p>have a comparable one. The Code integrates the topic of anti-corruption.</p> <p>The Code can be found at Aluflexpack's website: https://www.aluflexpack.com/downloads</p>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>The Entity has communicated its own Code of Conduct to suppliers of Non-CoC Material and requests that their suppliers adhere to this code unless they have an equivalent code of conduct. The Code of Conduct integrates responsible sourcing criteria.</p> <p>The Code can be found at Aluflexpack's website, section 13: https://www.aluflexpack.com/downloads</p>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>The Entity has communicated its own Code of Conduct to suppliers of Non-CoC Material and requests that their suppliers adhere to this code unless they have an equivalent code of conduct. The Code of Conduct integrates a requirement for human rights due diligence.</p> <p>The Code can be found at Aluflexpack's website, section 14: https://www.aluflexpack.com/downloads</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has communicated its own Code of Conduct to suppliers of Non-CoC Material and requests that their suppliers adhere to this code unless they have an equivalent code of conduct. The Code of Conduct integrates a requirement for conflict affected and high risk areas.</p> <p>The Code can be found at Aluflexpack's website, section 15: https://www.aluflexpack.com/downloads</p>
7.2 Risk assessment	Conformance	<p>The Entity has implemented procedures to assess the risks of non-compliance/compliance with its responsible sourcing policy of its Non-CoC Material suppliers. Due diligence checks are performed mainly using the ECOVADIS platform. Results of risk assessments and due diligence checks are well documented. Corrective actions will be requested and undertaken if the results are sub-standard.</p>
7.3 Complaints mechanism	Conformance	<p>The Entity has a system in place to receive and handle feedback, including complaints and grievances of stakeholders. This mechanism is in accordance with Criterion 3.2 of the ASI Performance Standard.</p>

CRITERION	RATING	COMMENT
8.1 Material Accounting System	Conformance	The Entity's management system includes a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based in the Entity's enterprise-resource-planning system.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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 has specified to use the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material, by mass. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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 total input of CoC Material over the

CRITERION	RATING	COMMENT
		Material Accounting Period. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure that max. 20% overdraw of total Input Quantity of CoC Material will happen within the Material Accounting Period in case of force majeure. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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 clearly identified. At the time of the audit, no ASI CoC Material was handled by the Entity.
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. At the time of the audit, no ASI CoC Material was handled by the Entity.
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 ASI 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.

CRITERION	RATING	COMMENT
		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 issuer.
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.
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 Chain of Custody 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 type 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 mass 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.

CRITERION	RATING	COMMENT
		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.
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	A provision about responding to requests related to CoC Documents is contained in the ASI management procedure. The Entity's ASI Manager is in charge to respond to requests related to CoC Documents.
9.6 Error management	Conformance	The Entity has defined in its ASI management procedure the way in which errors regarding CoC shipments shall be handled (documentation of the error, root cause analysis, communication, 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 check list has been created. Tests of checklist performed are satisfactory. As there has been no sourcing of CoC Material at the time of the first certification audit, the effectiveness of this verification will be assessed at the next surveillance audit.
10.2 Verify consistency with shipments	Conformance	The Entity has defined in their ASI management procedure how to verify the received CoC Documents and a specific checklist has been created to perform it. All deliveries are to be verified when entering the site prior to being entered in the internal IT system. As there has been no sourcing of CoC Material at the time of the first certification audit, the effectiveness of this verification will be assessed at the next surveillance audit.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined a quarterly check of the validity and scope of suppliers ASI CoC Certification.

CRITERION	RATING	COMMENT
10.4 Error management	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents as required by the ASI Chain of Custody Standard. Relevant staff have been trained accordingly. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.1b Link to Casthouse Products	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.1c No double counting	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.1d No Positive Balance for ASI Credits	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2a Date of issue	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2b Reference number	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2c Issuing Entity	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2d Receiving Entity	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2e Conformance statement	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2f ASI Credits statement	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.2g Quantity	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.

CRITERION	RATING	COMMENT
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3b Material Accounting System – purchasing	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3c Expiry	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3d No re-trading	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3e No allocation to physical products	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3f Verify supplier CoC Certification status	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	As confirmed by management interviews, this Criterion is not applicable, because the Entity neither used nor intends to use the Market Credits 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. As there has been no claims regarding CoC at the time of the first certification audit, the effectiveness of the procedure will be assessed at the next surveillance audit.
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 have to be supported by verifiable evidence. As there have been no claims regarding CoC at the time of the first certification audit, the effectiveness of the procedure will be assessed at the next surveillance audit.
12.1c Employee training	Conformance	The Entity provided documented evidence that relevant personnel (marketing/communications) have received training about CoC claims.

Document Control and Version History

Revision	Date	Notes
0	13 October 2021	Initial Certification Audit - Full Certification