

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

EUROFOIL

CERTIFICATE
NUMBER

21

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

11 APRIL 2019

DATE OF EXPIRY

10 APRIL 2020

CERTIFIED SINCE

11 APRIL 2019

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CERTIFICATION SCOPE

Eurofoil France site in Rugles (France).

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Eurofoil
ENTITY NAME	Eurofoil France
CERTIFICATION SCOPE	Eurofoil France site in Rugles (France)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	12 – 13 February 2019
AUDIT REPORT SUBMISSION	2 March 2019
AUDIT SCOPE	<p>The audit scope covered the Eurofoil France site in Rugles (France) and associated activities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Provisional Certification

AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	11 April 2019 – 10 April 2020
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	9 October 2022
CERTIFICATE NUMBER	21

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>Eurofoil France is certified against ISO 14001 and OHSAS 18001 management system certifications. The site did not receive any significant fines, penalties or warnings from the local authority since September 2017, when they joined ASI.</p> <p>Each departmental area appeared to identify relevant statutes, regulations and international agreements and implemented requirements in their management systems. The site maintains awareness about legal requirements through training and through engagement with industry associations.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>Eurofoil France did not have a documented risk assessment regarding anti-corruption and bribery.</p> <p>We noted that there is currently no formalised approval process for the acceptance and giving of gifts and entertainment and the site did not operate a gifts register.</p>
1.3 Code of Conduct	Conformance	<p>Eurofoil France recently updated its Social and Environmental Responsibility Policy which also included its Code of Conduct and implemented further alignment with ASI Performance Standard principles. The Policy was being communicated to workers at the time of the audit. E-learning training is being rolled out to workers with modules covering anti-corruption, bribery, conflict of interest and human rights, among others.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Eurofoil France evaluated and updated its Environmental and Social Responsibility Policy to align with the environmental, social and governance criteria set out in the ASI Performance Standard.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Senior management demonstrated commitment to sponsor the implementation of ASI and financial and other resources were available. Elements of Eurofoil France's strategy are in line with the ASI Performance Standard principles, including a focus on people, quality and performance.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Environmental and Social Responsibility Policy was available via multiple channels for workers internally and it is also published via Eurofoil's website below: http://www.eurofoil.com/us/about_us/ValuesCommitments.htm</p> <p>Eurofoil implemented a Supplier & external providers code of conduct.</p>
2.2 Leadership	Conformance	<p>The Quality director (senior manager level) has overall responsibility for ensuring conformance with ASI Performance Standards. Management review of ASI Performance Standard was completed and operational roles and responsibilities for areas of the Standard had been identified.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Eurofoil France has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>Eurofoil France implemented a Social Management System and reviewed its Social and Environmental Responsibility Policy to align with requirements set out in the ASI Performance Standard. The site completed a Sedex/SMETA audit and is certified to OHSAS 18001. The site is subject to regular external audits on health and safety and labour rights measures.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>Eurofoil France does not have a responsible sourcing policy covering environmental, social and governance issues. The Entity integrates environmental and health and safety evaluation criteria in their supplier selection process, however social and labour rights are not considered.</p>
2.5 Impact Assessments	Not Applicable	<p>No new projects or major changes to existing facilities took place at the Eurofoil France site since the Entity joined ASI in September 2017.</p>
2.6 Emergency Response Plan	Conformance	<p>Eurofoil France has emergency response plans in place. It holds a valid ISO 14001 Environmental Management Systems and OHSAS 18001 Health and Safety Management System certificate which is accepted by ASI as meeting criterion 2.6.</p>

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Not Applicable	All the mergers and acquisitions are decided by the shareholder AIAC and the holding Aluminium Investment Company Limited. These legal entities are outside of the scope of the ASI certification; therefore, the criterion is not applicable to Eurofoil France.
2.8 Closure, Decommissioning and Divestment	Conformance	Eurofoil France has a process to review environmental, social and governance issues as part of the planning process for closure, decommissioning and divestment. There were no closure, decommissioning and divestment plans at Eurofoil France since the Entity joined ASI in 2017.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Major Non-Conformance	Whilst Eurofoil France is disclosing some environmental information to the local authority, this is not widely accessible to stakeholders. The site is currently not disclosing its material environmental, social and economic impacts and associated action plans to monitor, manage and reduce these.
3.2 Non-compliance and liabilities	Conformance	No non-compliances, penalties, fines or non-monetary judgements were received by Eurofoil France in the past 12 months.
3.3a Payments to governments (legal and contractual)	Conformance	Eurofoil France is subject to financial audits by PwC (Price Waterhouse Cooper) on an annual basis which ensures it meets ASI Performance Standard's requirements payments to governments. The site implemented provisions regarding communication of financial results in its Social and Environmental Responsibility policy
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Eurofoil France has processes in place to manage stakeholder complaints, grievances and requests for information. It holds an ISO 14001:2015 certification which is recognised by ASI as meeting criterion 3.4 Stakeholder complaints, grievances and request for information.

PRINCIPLE 4 MATERIAL STEWARDSHIP

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessment was carried out and aligned with ISO 14040:2006 and ISO 14044:2006, covering all product lines for which aluminium is used.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Environmental Life Cycle Assessment can be provided by Key Account Managers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Eurofoil France does not publicly communicate about LCA information, however it is available upon request from Key Account Managers. Underlying assumptions, including system boundaries were depicted in the lifecycle assessment and communicated to clients upon request.
4.2 Product design	Conformance	Eurofoil created procedures to integrate lifecycle analysis considerations into product design and development strategy. Pilot projects with customers are aimed at ensuring recyclability of foil products and optimising the manufacturing process as well as thickness of products.
4.3a Aluminium Process Scrap (targets)	Conformance	As per ISO 9001 requirements, Eurofoil France has established objectives and targets to minimise the generation of Aluminium Process Scrap. This allows increasing the recovery of aluminium and recycling nearly 100% of internal scrap. In addition, recovered dross is used as input in the production process. Eurofoil France has set a recovery target of 72% and there is ongoing monitoring to implement this target.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Eurofoil France implemented an aluminium process scrap recycling plan at every process where scrap can be accrued. Scrap is collected by types of alloys and recycled internally. This aligns with the site's ISO 9001 certification.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	As explained by the site, Eurofoil France does not have the option to reuse any end of life aluminium scrap mostly because the restriction on their composition, especially the very low level of magnesium 0.003%.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Eurofoil France is a member of a number of associations working on increasing recycling of post-consumer waste. These included National Recycling Initiatives dedicated to aluminium foil/container/packaging recycling in France

CRITERION	RATING	COMMENT
		(METAL / FAR), UK (Alupro), European Aluminium Foil Association (EAFA).
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	Eurofoil France has a legal obligation to disclose their GHG emissions via the prefecture's website, however we noted energy use by type is not required by the legal authority. Eurofoil France need to publicly disclose its GHG emissions and energy use by source on an annual basis (e.g. website or sustainability report) as per the criterion.
5.2 GHG emissions reductions	Minor Non-Conformance	Eurofoil France established an annual energy reduction target (13% in 2019) and action plan, which if delivered, will reduce GHG emissions. However, it has not published this target publicly and nor has it established a formal time-bound GHG emissions target.
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	<p>Eurofoil France identified and reported its Emissions to Air to the local authority as per the requirements of their permit.</p> <p>Monoxide carbon levels have significantly exceeded local regulatory limits on one occasion. Whilst there was an obligation to retake the air measurement, Eurofoil France has not implemented plans to minimize these adverse impacts as required by the ASI Performance Standard criteria</p> <p>We noted that the site did not receive any penalties or non-monetary judgements from the local authority for exceeding these air emission levels.</p> <p>We also noted there are no legal obligations for continuous measurement of emissions to air.</p>
6.2 Discharges to Water	Conformance	Permit levels for discharge to water are followed by the site and robust monitoring processes are

CRITERION	RATING	COMMENT
		in place as per the site's ISO 14001 certification requirement.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	In accordance with its emergency response plan, Eurofoil France implemented robust controls in place for the assessment of spills and leakage. There is ongoing monitoring of a historic hydrocarbon spill from the 1950s as per permit requirements.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Management and external communication related to spills and leakage were detailed in the site's emergency response plan as per its ISO 14001 certified Environmental Management System.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Eurofoil France operates a crisis communication plan in case of major spills and leakage. There are regular exercises with the local fire brigade related to major spills.
6.4b Reporting of Spills (regular reporting)	Conformance	There were no major spills or leakages since 2017. Eurofoil France operates a crisis communication plan where requirements of immediate disclosure are specified.
6.5a Waste management and reporting (strategy)	Conformance	The waste management strategy is in line with the Waste Mitigation Hierarchy and targets were in place to reduce the generation of some waste streams. Percentages of waste sent to landfill, incineration and recycling were monitored.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	Eurofoil France regularly reports the quantities of Hazardous and Non-hazardous waste to the local authority. However, the site does not make this information available to the general public, as required by the ASI Performance Standard criterion.
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	Water withdrawal points were identified and quantities of water inputs are regularly monitored onsite as per regulatory permit.
7.1b Water assessment (risk assessment)	Conformance	Eurofoil France's environmental risk analysis included considerations for aspects and impacts of water withdrawal and water input as required by the ASI Performance Standard criterion. The site demonstrated compliance with permit levels regarding water withdrawal.
7.2a Water management (management plans)	Conformance	The environmental risk analysis informs the annual target setting for Eurofoil France, in line with ISO 140001 requirements. The water management plan is regularly reviewed in EHS (Environment Health and Safety) committee meetings, and improvements to water use are identified.
7.2b Water management (monitoring)	Conformance	Water inputs and outputs are regularly monitored on the environmental dashboards by

CRITERION	RATING	COMMENT
		the EHS department. There are monthly EHS committee meetings where water consumption and areas for improvement are discussed, in line with the site's ISO 14001 certified Environmental Management System.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	Eurofoil France reported water withdrawal to the local authorities on an annual basis, however we noted that material water-related risks (e.g. shortage of water during summer months) were not disclosed publicly by Eurofoil France.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Eurofoil France is a party to a national initiative to protect and enhance biodiversity locally called SRCE (Schéma Régional de Cohérence Ecologique, SRCE de Haute-Normandie). The site completed a geographical mapping of their operations and area of influence and concluded that it is not in a Natura 2000, ZICO (Zone d'importance pour la conservation des oiseaux) bird-protection zone, nor a ZNIEFF (Zone naturelle d'intérêt écologique faunistique et floristique) flora and fauna protection zone. However, the site still included river and forest areas and possible corridors of biodiversity in its biodiversity mapping, demonstrating good practice.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Eurofoil France is not located in a biodiversity protection area (as detailed in 8.1). The site has adopted a biodiversity plan following the recommendations of national initiative, SRCE and had periodic consultation with local authorities regarding biodiversity enhancements. The biodiversity plan is also discussed at internal periodic meetings.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Eurofoil France is not located in a biodiversity protection area (as detailed in 8.1). The site has adopted a biodiversity plan following the recommendations of national initiative, SRCE and had periodic consultation with local authorities, such as the DREAL, regarding biodiversity enhancements. The biodiversity plan is also discussed at internal periodic meetings.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	We noted that Eurofoil France did not have legal obligations to report on biodiversity outcomes, as it is not located in a biodiversity protection

CRITERION	RATING	COMMENT
		zone (see in 8.1). However, the site's biodiversity plan and achieved outcomes were not made publicly available as required by the ASI Performance Standard.
8.3 Alien Species	Conformance	Eurofoil France has considered the introduction of alien species via transportation in its environmental risk assessment, and prevents such cases by ensuring that wooden pallets are treated accordingly.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>Eurofoil included a policy commitment to respect Human Rights, as detailed in the Social and Environmental Responsibility Policy available at http://www.eurofoil.com/Documents/CodeDeConduiteDudelange.pdf.</p> <p>In addition, Eurofoil implemented a Supplier Code of Conduct and a Human rights training for relevant personnel.</p>
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	<p>Eurofoil France implements some elements of the human rights due diligence (e.g. e-learning, stakeholder mapping etc). However potential adverse impacts on human and labour rights of affected parties (e.g. cleaning services, low skill jobs, outsourced services, recruitment agencies) have not been identified and integrated in the site's annual SWOT (Strengths Weaknesses Opportunities and Threats) analysis.</p> <p>Social questionnaires are not currently included in supplier selection process to ensure human and labour rights by external parties such as recruitment agencies are upheld and due diligence is in place.</p>

CRITERION	RATING	COMMENT
		We noted knowledge and training of the UN Guiding Principles on Business and Human Rights were limited.
9.1c Human Rights Due Diligence (remediation)	Not Applicable	No claims or remediation processes were initiated by interested parties or vulnerable groups.
9.2 Women's Rights	Conformance	Eurofoil France complies with French labour law on anti-discrimination and women's rights, as part of general employees' rights, and this is embedded in internal policies. Gender pay gap statistics are regularly reviewed and shared during collective negotiations.
9.3 Indigenous Peoples	Not Applicable	There are no indigenous people near the site.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people near the site.
9.5 Cultural and sacred heritage	Not Applicable	There is no site of cultural or sacred heritage near the site.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement has happened at Eurofoil France.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement has taken place at the site.
9.7a Local Communities (rights and interests)	Conformance	Eurofoil France has undertaken a stakeholder mapping exercise, identifying its key stakeholders and their interests. The level of interaction with stakeholders, reporting obligations and the frequency of providing information are regularly monitored by the site.
9.7b Local Communities (impacts)	Conformance	Eurofoil France has undertaken a stakeholder mapping exercise, identifying its key stakeholders and their interests. The level of interaction with stakeholders, reporting obligations and the frequency of providing information are regularly monitored by the site.
9.7c Local Communities (livelihoods)	Minor Non-Conformance	Eurofoil France has mapped its key stakeholders, however one minor non-conformance was identified: there is no regular engagement with the local council, the neighbours and farmers. Regular engagement on key issues of importance (e.g. local employment) and communication on the site's environmental performance (e.g. emissions to air, soil pollution management) is not occurring.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	Eurofoil France manages local supply chain and suppliers, however global supply chain of metal purchasing is managed at Eurofoil Luxembourg. A minor non-conformance was raised at Eurofoil Luxembourg related to conflict-affected and high-risk areas, integrating this element in the organisation's responsible sourcing Policy.
9.9 Security practice	Conformance	Several documents describe the human rights applicable in terms of security and safety to the organization: the employee handbook, the Eurofoil security booklet, the collective agreements and the labor code. Discussions with the security guard, HR, workers, and reviews of training logs confirmed implementation.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There is constant trade-union activity and dialogue with senior management, they meet monthly or more. Multiple committees allow frequent and open discussions between senior management and workers: the CHSCT (Committee for Health and Safety and Working Conditions), mainly related to safety, the Questions and Answers where queries from workers are escalated and answered by management, the Comite d'Entreprise where both worker representatives and senior management are present, the Worker representatives' meetings, and the NAO (annual mandatory trade-union negotiation) meetings). A wide range of communication channels are used for sharing those discussions internally.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Eurofoil France implements the set of nationwide "conventions collectives" prescribing the rules for the aluminium industry, based on French law, and there is strong awareness of those amongst the workers.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Freedom of Association is not restricted at Eurofoil France, in compliance with local law. The existence of trade-union related activities at the site was evidenced by the review of policies, minutes and face-to-face meetings with union members and representatives who were part of the workforce, as described in more detail in 10.1.a and b.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Conformance	The French Labour Law is very protective and correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence.
10.2b Child Labour (hazardous)	Conformance	The French Labour Law is very protective and is correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence reviewed.
10.2c Child Labour (worst forms)	Conformance	The French Labour Law is very protective and is correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence reviewed.
10.3a Forced Labour (human trafficking)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and implemented at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3b Forced Labour (deposits, fees, advances)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3c Forced Labour (migrant workers)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3d Forced Labour (debt bondage)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and implemented at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3g Forced Labour (freedom to terminate employment)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.4 Non-Discrimination	Conformance	Reference documents at Eurofoil France contain reference to the International Labour Organisation conventions 100 and 111 on the prevention of discrimination. This is adequately implemented in the recruitment, promotion, training, provision of health and safety equipment, pay, working time, benefits, and similarity of treatment perceived between different workers such as permanent and interim workers, or male and female employees.
10.5 Communication and engagement	Conformance	There are many committees and channels of communication available for internal engagement at Eurofoil France. In addition, Eurofoil operates a whistleblowing line where workers can anonymously report issues of concern.
10.6 Disciplinary practices	Conformance	Disciplinary practice is clearly explained in the employee handbook and other reference documents used at Eurofoil France. The disciplinary practice follows local law, and worker interviews evidenced that the use of sanctions was fair and reasonable.
10.7a Remuneration (living wage)	Conformance	All employees earn at least minimum wage, as listed in the internal salary grid. Wages are

CRITERION	RATING	COMMENT
		regulated through the collective bargaining agreement of the sector, and those rules are clearly implemented at Eurofoil France, as evidenced by payslip reviews and worker interviews. Eurofoil France also provides additional benefits such as meal allowances to workers.
10.7b Remuneration (method of payment)	Conformance	Payslips are received by all employees through the mail, payment is done by bank-transfer.
10.8 Working Time	Conformance	Working time is regulated by the law, the collective convention, the rules of procedure, and the employment contract. Eurofoil France has a clocking system to check the hours worked, as well as the resting times. Eurofoil France has various patterns of work including shift work, night work and weekend work, all compensated through pay or recuperation time. The clocking system records presence and absence. The pay software imports the absence as well as the variable elements from the previous month.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	OHSAS18001 certification valid until August 2019.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	OHSAS18001 certification valid until August 2019.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	OHSAS18001 certification valid until August 2019
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	OHSAS18001 certification valid until August 2019.
11.2 OH&S Management System	Conformance	OHSAS18001 certification valid until August 2019.
11.3 Employee engagement on health and safety	Conformance	OHSAS18001 certification valid until August 2019.
11.4 OH&S performance	Conformance	OHSAS18001 certification valid until August 2019.