
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

EUROFOIL

CERTIFICATE
NUMBER

22

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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*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

Eurofoil Luxembourg site in Dudelange
(Luxembourg).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Eurofoil

ENTITY NAME Eurofoil Luxembourg

CERTIFICATION SCOPE Eurofoil Luxembourg site in Dudelange (Luxembourg)

SUPPLY CHAIN ACTIVITIES

- Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Certification Audit

AUDIT FIRM DNV GL

AUDIT DATE 4 – 7 February 2019

AUDIT REPORT SUBMISSION 13 March 2019

AUDIT SCOPE The audit scope covered the Eurofoil Luxembourg site in Dudelange (Luxembourg) and associated activities.

Supply chain activities included in the audit scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT OUTCOME

- Provisional 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

11 April 2019 – 10 April 2020

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

10 October 2019

CERTIFICATE
NUMBER

22

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Eurofoil Luxembourg SA (hereafter referred to as "Eurofoil Luxembourg") obtained management system certifications for ISO 14001, ISO 9001 and OHSAS 18001 and maintained a robust compliance program to meet ASI Performance Standard criteria. Each departmental area identified 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.
1.2 Anti-Corruption	Minor Non-Conformance	There is currently no formalised approval process for the acceptance and giving of gifts and entertainment and the site does not operate a gifts register.
1.3 Code of Conduct	Minor Non-Conformance	The Supplier & external providers code of business conduct is not communicated to metal suppliers and social and environmental due diligence of these suppliers is currently limited.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Eurofoil Luxembourg 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.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrated commitment to sponsor the implementation of ASI and financial and other resources were available. Elements of Eurofoil's strategy are in line with the ASI Performance Standard principles, including a focus on people, quality and performance.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Environmental and Social Responsibility Policy was available via multiple channels for internal stakeholders and communicated externally as part of the Supplier & external providers code of business conduct. Eurofoil Luxembourg SA's Social and Environmental Responsibility Policy is available on its website: http://www.eurofoil.com/us/about_us/ValuesCommitments.htm

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	A Senior Management representative has been nominated by the board.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Eurofoil Luxembourg has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	Eurofoil Luxembourg SA implemented a Social Management System and reviewed its Social and Environmental Responsibility Policy to align with requirements set out in the ASI Performance Standard. Eurofoil Luxembourg had completed a Sedex/SMETA audit and is certified to OHSAS 18001:2007. The site is subject to regular external audits on health and safety and labour rights measures.
2.4 Responsible Sourcing	Minor Non-Conformance	Eurofoil Luxembourg SA has not created a responsible sourcing policy, set a sourcing strategy or integrated an environmental, social and governance approach aligned with the ASI Performance Standard. Eurofoil Luxembourg SA has not reviewed its supplier risk assessment to ensure it is adequate and supported by evidence from the due diligence reviews.
2.5 Impact Assessments	Conformance	Eurofoil Luxembourg SA's newly adopted Capital expenditure procedure was updated to reflect environmental, social, cultural and Human Rights Impacts Assessments criteria of the Standard for new projects and major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	Eurofoil Luxembourg has emergency response plans in place. It holds a valid ISO 14001:2004 Environmental Management Systems certificate and OHSAS 18001:2007 Health and Safety Management System certificate which is accepted by ASI as meeting criterion 2.6.
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 Luxembourg SA.
2.8 Closure, Decommissioning and Divestment	Conformance	There were no closure, decommissioning and divestment plans at Eurofoil Luxembourg since the Entity joined ASI in 2017.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Major Non-Conformance	Whilst the site is disclosing some environmental information to the local authority, this is not widely accessible to stakeholders. Eurofoil Luxembourg 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	Eurofoil Luxembourg is subject to audit by Deloitte of its Annual Report and Accounts. Fines, judgments, penalties and non-monetary sanctions are included in scope. We understand Eurofoil Luxembourg has not received any fines, judgments, penalties and non-monetary sanctions in the last 12 months.
3.3a Payments to governments (legal and contractual)	Conformance	Eurofoil Luxembourg SA is subject to financial audits by Deloitte on an annual basis which ensures it meets ASI Performance Standard's requirements related to 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 Luxembourg 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		
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 Assessments were available from Key Account Managers.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Eurofoil Luxembourg does not publicly communicate about LCA information, however it is available upon request from Key Account Managers. Underlying assumptions, including

CRITERION	RATING	COMMENT
		system boundaries were depicted in the lifecycle assessment and communicated to clients upon request.
4.2 Product design	Conformance	Eurofoil Luxembourg SA 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. The site also implemented projects to increase the recycling of customers' scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	As per ISO 9001 requirements, Eurofoil Luxembourg has established objectives and targets to minimise the generation of Aluminium Process Scrap, thus increase the recovery of aluminium and recycles nearly 100% of its internal scrap. In addition, recovered dross is used as input in the production process. Eurofoil Luxembourg's recovery rate is approximately 70% and objectives and targets are in place to increase this yield.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Eurofoil Luxembourg 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 Luxembourg 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%. However, Eurofoil Luxembourg is working with customers on pilot projects to increase the extraction of aluminium from this pre-consumer scrap which can then be re-used in Eurofoil's foundries.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Eurofoil Luxembourg SA 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 (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	Whilst we noted the carbon emissions were verified as part of the EU ETS audit by TUV

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		Nord, annual material GHG emissions and energy use by source were not publicly reported by Eurofoil Luxembourg. Whilst some limited information was disclosed to clients/visitors at the main entrance, this is not widely accessible to all stakeholders.
5.2 GHG emissions reductions	Minor Non-Conformance	Eurofoil Luxembourg did not set time-bound GHG emission reduction targets, however we noted that there are internal targets in place to reduce energy use, which, if delivered, will reduce GHG emissions.
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	Conformance	Eurofoil Luxembourg regularly monitors its emissions to air, maintains an inventory and developed action plans to reduce these. The site performed in compliance with local regulatory requirements related to air emissions. The site holds a valid ISO 14001 Environmental Management System certificate. The site reports emissions to air to the local authority on a regular basis. There is no public reporting of emissions to air via its website or annual reports.
6.2 Discharges to Water	Conformance	Discharges to water were covered by the site's ISO 14001 Environmental Management System certification and meets its permitting requirements. Eurofoil Luxembourg maintains an inventory, monitoring, plan to mitigate impacts as a result of discharges to water as per current system.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Assessment and Management of Spills and Leakage is documented by Eurofoil Luxembourg's ISO 14001 certified Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Management and external communication plans related to spills and leakage are detailed in Eurofoil Luxembourg's emergency response

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		plan (Plan D'Urgence). No major spills and leakage occurred on site that would trigger the external communication requirements. This aspect is covered by the site's ISO 14001 certified Environmental Management System.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place for disclosure to affected parties of the volume, type and potential impact of significant Spills immediately after an incident.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	There is no readily accessible public disclosure of Impact Assessments of any Spills (or the absence of them) and any remediation actions taken.
6.5a Waste management and reporting (strategy)	Minor Non-Conformance	A comprehensive waste management strategy and plan are in place, however there is no evidence that the Waste Management Strategy was designed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	Eurofoil Luxembourg discloses its waste streams, waste designation, waste code (CED code), quantity, unit and associated waste disposal method to the local authority on a regular basis. The Entity does not make this information available to the general public.
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.
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.

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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	Eurofoil Luxembourg monitors its water balance. Water consumption and withdrawal are monitored as are emissions as cooling vapour and discharges. The site has set a water reduction target (5% on previous year), and monitors an action plan to prevent leaks and to reduce water consumption.
7.1b Water assessment (risk assessment)	Conformance	Water use is limited to metered water via the fresh water system. All regulatory requirements relating to water are met and the key risks relating to use and discharges are managed and met. The site and community would benefit from supporting a catchment related water risk assessment.
7.2a Water management (management plans)	Conformance	The site has set a water reduction target (5% on previous year), and monitors an action plan to prevent leaks and to reduce water consumption. Water management plan is regularly reviewed by the environmental department.
7.2b Water management (monitoring)	Conformance	Water inputs and outputs are regularly monitored on the environmental dashboards by the environmental team and consumption of water is covered in management reviews.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	Eurofoil Luxembourg did not disclose its water withdrawal and water use via public channels (e.g. sustainability report) and material water risks.

PRINCIPLE 8 BIODIVERSITY

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Major Non-Conformance	The site meets its legal requirements however there has been no biodiversity risk assessment and there is a limited understanding of the role the site can play as part of the wider regional ecosystem and to enhance biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Major Non-Conformance	Absence of documented action plan or proactive management of biodiversity other than through specifying FSC timber for its pallets.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Major Non-Conformance	No use of mitigation hierarchy' to avoid, minimise, rehabilitate or offset impacts on biodiversity. No consultation with local experts.
8.2c Biodiversity management (reporting)	Major Non-Conformance	There is no public reporting on biodiversity outcomes.
8.3 Alien Species	Major Non-Conformance	No inventory or proactive prevention of accidental or deliberate introduction of Alien Species.
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	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 .
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	Eurofoil Luxembourg implemented some elements of the human rights due diligence (e.g. e-learning, stakeholder mapping). However, the supplier risk assessment was inadequate and did not include a risk assessment of metal suppliers. Knowledge and training related to the UN Guiding Principles on Business and Human Rights were limited.

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9.1c Human Rights Due Diligence (remediation)	Conformance	Since Eurofoil joined ASI, no claims for remediation were received by the site. The site operated two complaint mechanisms which was effective; a hotline for employees and a procedure and form for external stakeholders.
9.2 Women's Rights	Conformance	Eurofoil Luxembourg complies with local law on aspects such as equal pay and equal opportunities. Women are represented at senior management level and are part of decision-making processes. On the other hand, low levels of gender diversity were observed on the factory floor.
9.3 Indigenous Peoples	Not Applicable	There are no indigenous peoples near the site.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous peoples near the site.
9.5 Cultural and sacred heritage	Not Applicable	There is no area of cultural and sacred heritage near the site.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement has happened at Eurofoil Luxembourg.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement has happened at Eurofoil Luxembourg.
9.7a Local Communities (rights and interests)	Conformance	Eurofoil Luxembourg demonstrated an understanding of community interests. The site identified a range of stakeholders, their issues of importance and prioritised frequency of communication to them. The site implemented documented procedures to respond to grievances or requests for information.
9.7b Local Communities (impacts)	Conformance	Please see 9.7a. The site implemented documented procedures to respond to grievances or requests for information.
9.7c Local Communities (livelihoods)	Conformance	Eurofoil Luxembourg has built a robust understanding of its key stakeholders and methods to engage with them. The site implemented procedures to respond to grievances and requests for information.
9.8 Conflict-Affected and High-Risk Areas	Minor Non-Conformance	Eurofoil Luxembourg site is located in Dudelange which is not a Conflict-Affected or High-Risk Area. However, the site purchases metals (e.g. ingots) from a global supply chain, and its Responsible Sourcing Policy did not

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		integrate requirements not to source from Conflict Affected and High-Risk Areas.
9.9 Security practice	Conformance	Eurofoil Luxembourg implemented documented process to demonstrate human rights compliance in terms of security practices: the employee handbook, the Eurofoil security booklet, the collective agreements, the labor code, training records.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Multiple testimonies and documents showed there is an effective dialogue between senior management and operators. The "Delegation" (internal worker representatives committee) has a very strong presence in the company; it is composed of a mix of operators and office workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Multiple testimonies and documents showed there is an effective dialogue between senior management and operators. The "Delegation" (internal worker representatives committee) has a very strong presence in the company; it is composed of a mix of operators and office workers.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	In Luxembourg, the local law does not restrict the right to freedom of association and collective bargaining and this is reflected at the site, with a very active worker representative committee and union presence.
10.2a Child Labour (minimum age)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure requiring a photocopy of IDs in personnel files.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure requiring a photocopy of IDs in personnel files.

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10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure requiring a photocopy of IDs in personnel files.
10.3a Forced Labour (human trafficking)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3c Forced Labour (migrant workers)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3d Forced Labour (debt bondage)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3e Forced Labour (freedom of movement)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is

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		reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.4 Non-Discrimination	Conformance	Eurofoil Luxembourg explicitly prohibits discrimination in its Social and Environmental Responsibility Policy, the employee handbook and the Convention collective. Recruitment, promotion, pay, working time, trade-union membership is in line with this policy. Multiple channels of communication are in place to report any grievances.
10.5 Communication and engagement	Conformance	Frequent internal dialogues were in place involving all levels from operators to senior management. Furthermore, there are regular joint committee and health and safety committee meetings where issues and concerns can be discussed, involving workers, trade union representatives and senior management. Please see 10.1a.
10.6 Disciplinary practices	Conformance	Eurofoil Luxembourg respects its employees and disciplinary practices are explained in the employee handbook and other documents of reference, and follow the local law, and in some cases are more favourable than local laws (e.g.

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		number of warnings issued before a higher sanction). Worker representatives are also involved with disciplinary investigation processes.
10.7a Remuneration (living wage)	Conformance	Internal documents of reference such as Convention collective detailed salary levels, deductions and taxes, overtime pay, weekend pay, bonuses. These aspects are negotiated with the trade union on a periodic basis. The Convention collective are adequately implemented in the workplace.
10.7b Remuneration (method of payment)	Conformance	All employees are paid through bank transfer every month. A copy of the payslip is also sent through the post, and a separate one for bonuses. This was confirmed by worker interviews.
10.8 Working Time	Conformance	Internal documents of reference such as the convention collective detail working time, overtime work, weekend work, holidays which are adequately implemented in HR practices.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	OHSAS18001 certification valid until March 2021.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	OHSAS18001 certification valid until March 2021.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	OHSAS18001 certification valid until March 2021.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	OHSAS18001 certification valid until March 2021.
11.2 OH&S Management System	Conformance	OHSAS18001 certification valid until March 2021.
11.3 Employee engagement on health and safety	Conformance	OHSAS18001 certification valid until March 2021.
11.4 OH&S performance	Conformance	OHSAS18001 certification valid until March 2021.

Document Control and Version History

Revision	Date	Notes
0	11 April 2019	Issued
1	14 June 2019	Correction to next audit due date