
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTELLIUM

CERTIFICATE
NUMBER

55

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

4 DECEMBER 2019

DATE OF EXPIRY

3 DECEMBER 2022

CERTIFIED SINCE

4 DECEMBER 2019

AUTHORISED BY

A handwritten signature in white ink on a dark grey background.

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

Rolling mill and casthouse facilities of the
Constellium Singen site (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Rolled Products Singen GmbH & Co. KG
CERTIFICATION SCOPE	Rolling mill and casthouse facilities of the Constellium Singen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	GUTcert (AFNOR GROUP)
AUDIT DATE	6 October 2019
AUDIT REPORT SUBMISSION	5 November 2019
AUDIT SCOPE	<p>Rolling mill and casthouse facilities of the Constellium Singen site (Germany).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Post-Casthouse <p>Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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.

-
- ☑ 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 4 December 2019 – 3 December 2022

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 3 June 2021

CERTIFICATION NUMBER 55

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constellium (parent company of the audited Entity "Constellium Rolled Products Singen GmbH & Co. KG") is an active ASI member (production and transformation group) 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/constellium/
1.2 Management system	Conformance	The Entity has established a management system that addresses all applicable requirements of the ASI CoC standard. It has implemented relevant policies, systems, procedures and processes. The management system includes a robust material accounting system based on the Entity's enterprise-resource-planning system.
1.3 Management system reviews	Conformance	The Entity has established a mechanism for the periodic review and update of the chain-of-custody management system, in line with the other facets of its integrated management system.
1.4 Management representative	Conformance	On group level, the director group sustainability is in charge for implementation of and compliance with ASI requirements. The site manager has taken overall responsibility of the implementation of ASI standards within the Entity. The specific requirements regarding ASI chain-of-custody are managed by the supply chain specialist of the Entity. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has established a training plan, prepared and conducted chain-of-custody specific training to relevant personnel and intends to raise awareness of all employees.
1.6 Record keeping	Conformance	The Entity has implemented measures to ensure that up-to-date records covering all applicable requirements of the ASI CoC Standard are maintained and retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Reporting will include input and output quantities of CoC Materials over the calendar year. Note: A report has not yet been issued, as at the

CRITERION	RATING	COMMENT
		time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7b Reporting to ASI (Input Percentage)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7c Reporting to ASI (Positive Balance)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity is not engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. This criterion is therefore not applicable.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity does not intend to use ASI Credits. This criterion is therefore not applicable.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This criterion (2.1) is currently not applicable, as the Entity does not include outsourcing contractors within their CoC certification scope.
2.2a Control of CoC Material	Not Applicable	This criterion (2.2a) 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 (2.2b) is currently not applicable, as the Entity does not include outsourcing contractors within their CoC certification scope.

CRITERION	RATING	COMMENT
2.2c Risk assessment	Not Applicable	This criterion (2.2c) 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 (2.3) 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 (2.4) 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 (2.5) 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.
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.

CRITERION	RATING	COMMENT
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	Conformance	Constellium Singen Casthouse is within the CoC Certification Scope, which is defined as Constellium Rolled Products Singen GmbH & Co. KG with its supply chain activities Casthouse and Post-Casthouse.
5.1b ASI Performance Standard – Casthouses	Conformance	Constellium Singen is a founding ASI member, and has achieved certification against the ASI Performance Standard in 2019, as is shown on the ASI website https://aluminium-stewardship.org/about-asi/asi-members/constellium/ The Certification scope is rolling mill and casthouse facilities of the Constellium Singen site (Germany).
5.2 Casthouse Products	Conformance	The Entity's material accounting system is designed to ensure that all input as well as output of CoC material is identified by unique identification numbers. These numbers are traceable with in the Entity's enterprise-resource-planning system. All output of ASI CoC material can be linked to the input quantity of CoC Material for a given material accounting period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Due to the system design and as the Entity has both casthouse and post-casthouse activities under the same ASI certification, it is ensured that the Entity is producing ASI aluminium from material within its CoC certification scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity is certified against the ASI performance standard, as can be verified on the ASI website (https://aluminium-stewardship.org/about-asi/asi-members/constellium/).
6.1c Sourcing ASI Aluminium	Conformance	The Entity's strategic plans with future ASI certified suppliers will secure the supply and production of ASI CoC materials. The Entity will be sourcing ASI aluminium directly from another ASI CoC certified Entity, or via a metal's trader or warehouse. The documented system in place ensures that in any case, the Entity which produced the ASI aluminium can supply or verify the associated CoC documentation, containing information sufficient to identify the corresponding shipment. The ASI status

CRITERION	RATING	COMMENT
		of suppliers of ASI material will be periodically checked by the Entity.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The supplier code of conduct is in line with criterion 1.2 of the ASI Performance Standard and covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics (anti-corruption) - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics - Sustainable Procurement - and acceptance to be assessed against these principles (like "human rights due diligence"). Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment,

CRITERION	RATING	COMMENT
		Health, Safety and Energy - Business Ethics (including Export/Import restrictions and regulations and sourcing of Conflict Minerals, Dodd Franck Act). - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.2 Risk assessment	Conformance	The Entity runs a risk oriented, documented, due diligence process for its suppliers. This process includes the need for measurable risk mitigation in the event of identified potential or actual adverse impacts. The process is described in Constellium's responsible supply chain management policy, which can be accessed in multiple languages via the following link: https://www.constellium.com/sustainability/download/policies-codes-conduct
7.3 Complaints mechanism	Conformance	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. Main means of contact are the webpage https://www.constellium.com/contact and the E-mail address Sustainability@constellium.com .
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
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.

CRITERION	RATING	COMMENT
8.4 Input Percentage	Conformance	The input percentage for a given material accounting period is calculated using the formula prescribed in criterion 8.4 of the ASI CoC standard.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The input percentage for a given material accounting period is used to calculate the output quantity (by mass).
8.7 Output Quantity designation	Conformance	By system design it is ensured that the output quantity of CoC material, which may form part of the total production, will be designated as 100% of the CoC material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	By system design the Entity has ensured that the input percentage for a given material accounting period is used to determine the output quantity of eligible scrap (pre-consumer scrap from its processing).
8.9 Outputs not exceed inputs	Conformance	By system design it is ensured that the total output of CoC material and eligible scrap does not proportionally exceed the input percentage as applied to total input of CoC material and eligible scrap over the material accounting period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's material accounting system is designed to ensure that - max. 20% overdraw of total input quantity of CoC material will happen within the material accounting period in case of force majeure; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation - and the internal overdraw will be made up within the subsequent material accounting period.
8.10b Internal Overdraws (not exceed affected amount)	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; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation - and the internal overdraw will be made up within the subsequent material accounting period.
8.10c Internal Overdraws (period to make up)	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; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation

CRITERION	RATING	COMMENT
		- and the internal overdraw will be made up within the subsequent material accounting period.
8.11a Positive Balance (carry over)	Conformance	The Entity's material accounting system is designed to ensure that - the accounting system does clearly identify any carry over of a positive balance, - where the Entity has a positive balance of output CoC material at the end of a given material accounting period, this will be carried over to the subsequent material accounting period but will be either drawn down or expire at the end of that subsequent accounting period.
8.11b Positive Balance (expiry)	Conformance	The Entity's material accounting system is designed to ensure that - the accounting system does clearly identify any carry over of a positive balance, - where the Entity has a positive balance of output CoC material at the end of a given material accounting period, this will be carried over to the subsequent material accounting period but will be either drawn down or expire at the end of that subsequent accounting period.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has a system that can produce, control and store CoC documents. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2a Date of issue	Conformance	The Entity has a system that can produce CoC documents with a date of issue. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2b Reference number	Conformance	The Entity has a system that can produce CoC documents with a reference number. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2c Issuing Entity	Conformance	The Entity has a system that can produce CoC documents with the Issuing Entity. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2d Receiving customer	Conformance	The Entity has a system that can produce CoC documents with the receiving customer. At the time of the audit, there were no examples of effective

CRITERION	RATING	COMMENT
		implementation as the Entity has not yet sourced CoC Material.
9.2e Responsible employee	Conformance	The Entity has a system that can produce CoC documents with the responsible employee. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2f Conformance statement	Conformance	The Entity has a system that can produce CoC documents with a conformance statement. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2g Type of CoC Material	Conformance	The Entity has a system that can produce CoC documents with the type of CoC material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2h Mass of CoC Material	Conformance	The Entity has a system that can produce CoC documents with the mass of CoC material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2i Mass of total material	Conformance	The Entity has a system that can produce CoC documents with the mass of total material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3a Sustainability Data (optional)	Conformance	The Entity has established a template for issuing CoC documents and will communicate its European average GHG emissions upon customer request. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3b Sustainability Data (passing on)	Conformance	The Entity has established a template for issuing CoC documents and will communicate its European average GHG emissions upon customer request. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has established a template for issuing CoC documents and will integrate its ASI Certification status for the ASI Performance Standard for the Entity. At the time of the audit, there

CRITERION	RATING	COMMENT
		were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.4 Supplementary Information (optional)	Conformance	The Entity has established a template for issuing CoC documents and will communicate supplementary data upon customer request with well documented objective evidence. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.5 Response to verification requests	Conformance	The Entity has established a procedure for managing CoC communication with customers. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.6 Error management	Conformance	The Entity has implemented a procedure for managing its CoC documents as required by the ASI Chain of Custody Standard and a management system of potential errors. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has implemented a procedure with verification steps to review the completeness of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.2 Verify consistency with shipments	Conformance	The Entity has implemented a procedure with verification steps to review the consistency of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has implemented a procedure with verification steps to review the supplier CoC Certification status of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.4 Error management	Conformance	The Entity has implemented a procedure to review received CoC documents as required by the ASI Chain of Custody Standard and a management system of potential errors. At the time of the audit,

CRITERION	RATING	COMMENT
		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	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.

CRITERION	RATING	COMMENT
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has established internal procedures and prepared internal trainings to ensure any external communication is consistent with the ASI Claim Guide. Any external communication is controlled centrally by the Entity's Headquarters.
12.1b Verifiable evidence	Conformance	The Entity has established internal procedures to ensure any external communication is consistent with the ASI Claim Guide and only verifiable claims are made.
12.1c Employee training	Conformance	The Entity has established internal procedures and prepared trainings to ensure any external communication is consistent with the ASI Claim Guide.