
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTANTIA TEICH

CERTIFICATE
NUMBER

78

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

2 MARCH 2020

DATE OF EXPIRY

1 MARCH 2023

CERTIFIED SINCE

2 MARCH 2020

AUTHORISED BY

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

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](http://www.aluminium-
stewardship.org)*

CERTIFICATION SCOPE

Constantia Teich facility in Austria undertakes rolling
of aluminium foil to basic and final conversion.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Constantia Flexibles International GmbH
ENTITY NAME	Constantia Teich
CERTIFICATION SCOPE	Constantia Teich facility in Austria undertakes rolling of aluminium foil to basic and final conversion.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• First Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	15 October . 16 October 2019
AUDIT REPORT SUBMISSION	11 February 2020
AUDIT SCOPE	<ul style="list-style-type: none">• The scope of certification comprises the Constantia Teich facility in Austria.
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.<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	2 March 2020 . 1 March 2023
NEXT AUDIT TYPE	Re-certification

NEXT AUDIT
DUE DATE

1 March 2023

CERTIFICATION
NUMBER

78

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constantia is founding member of the Aluminium Stewardship Initiative ASI and was the third company worldwide that was certified against the performance standard. It communicates its status on the Constantia website (see https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing)
1.2 Management system	Conformance	Constantia Teich has a well-established integrated management system. The site is certified against ISO 14.001, BRC, FSC, Kosher, Halal and other standards (see https://www.cflex.com/de/qualitaet/zertifikate-letters-of-conformity). ASI requirements are covered by the existing management systems and additional policies and procedures.
1.3 Management system reviews	Conformance	Constantia Teich conducts annual management reviews for its management systems. The ASI requirements are included in an appendix to the management review and reviewed once a year.
1.4 Management representative	Conformance	The managing director of the plant is the management representative for ASI. The role is supported by headquarters and local staff in the implementation of ASI requirements.
1.5 Training	Conformance	All employees have to participate in an annual e-learning about environment and energy. Information about the ASI requirements are included in this training, all relevant staff is trained additionally on the ASI requirements through the process instructions.
1.6 Record keeping	Conformance	Legal requirements define the retention time of documents. This includes the five years required by ASI.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	Constantia Teich defined, that the reporting of ASI material has to be done to ASI within the first three months of the following year.
1.7b Reporting to ASI (Input Percentage)	Conformance	Constantia defined to report to ASI within the first three months of the following year all ASI related information, including the percentages calculated for the calendar year. At the time of the ASI CoC audit, ASI certified material was not yet in use.
1.7c Reporting to ASI (Positive Balance)	Conformance	Constantia defined to report to ASI within the first three months of the following year all ASI related

CRITERION	RATING	COMMENT
		information, including any positive material balance - if applicable. At the time of the ASI CoC audit, ASI certified material was not yet in use.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	Constantia defines to report to ASI within the first three months of the following year all ASI related information, including any internal overdraw of the positive material balance - if applicable. At the time of the ASI CoC audit, ASI certified material was not yet in use.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Not applicable, as Constantia Teich is not engaged in Aluminium re-melting/refining to produce recycled aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable, as Constantia Teich is not engaged in the production of casthouse products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	Constantia defined to report to ASI within the first three months of the following year all ASI related information, including the use of ASI credits - if applicable. At the time of the ASI CoC audit, ASI certified material was not yet in use and Constantia decided, not to use credits.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Currently no outsourcing of ASI related material or processes is planned at Constantia Teich. If outsourcing activities are planned, they have to be included in the scope of the certification.
2.2a Control of CoC Material	Conformance	Currently no outsourcing of ASI related material or processes is planned at Constantia Teich. Legal ownership or the control of CoC material would be regulated accordingly - if necessary in the future.
2.2b No further outsourcing	Conformance	Currently no outsourcing of ASI related material or processes is planned at Constantia Teich. Constantia Teich defines in the process instruction, that further outsourcing is not permitted.
2.2c Risk assessment	Conformance	Currently no outsourcing of ASI related material or processes is planned at Constantia Teich. Constantia Teich defined in the process instruction, that a company where the material is outsourced to, has to be qualified accordingly and a risk analysis has to be conducted before outsourcing to this company.
2.3 Output Quantity	Conformance	Currently no outsourcing of ASI related material or processes is planned at Constantia Teich. Constantia Teich defined in the process instruction, that a company where the material is outsourced to,

CRITERION	RATING	COMMENT
		has to be qualified accordingly and a risk analysis has to be conducted before outsourcing to this company.
2.4 Verification and record-keeping	Conformance	Constantia Teich is currently not outsourcing any ASI related material or processes. It foresees in its process instruction, that in the case of outsourcing, additional agreements have to be found to guarantee the quantity of output material is consistent with the quantity of input material.
2.5 Error management	Conformance	Constantia Teich is currently not outsourcing any ASI related material or processes. It foresees to elaborate detailed specifications in the case of outsourcing to regulate the identification and steps to be taken after the identification of any problems - and to prevent the reoccurrence of these problems.

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	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard . Casthouses	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope . Post-Casthouse	Conformance	Constantia defined in its process instruction, that it purchases ASI certified material only from ASI certified entities and that it is the responsibility of the purchasing department, to check and guarantee, that the provided material is ASI certified, if purchased through an intermediate dealer.
6.1b ASI Performance Standard . Post-Casthouse	Conformance	Constantia defines in its process instruction, that it purchases ASI certified material only from ASI certified entities. If the supplier is not yet certified against ASI, Constantia Teich commits him to become certified within two years. It is the responsibility of the purchasing department, to discuss this at the annual meetings.
6.1c Sourcing ASI Aluminium	Conformance	All ASI-Aluminium and ASI-containing material carry a special marking that identifies it as ASI material with a special material code ID. ASI-material can be identified and tracked from supplier over factory until shipment.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Constantia communicates its commitment regarding anti-corruption, fair business practices etc. (see https://www.cflex.com/quality/code-of-conduct) in its Code of Conduct that has to be accepted by all suppliers and subcontractors.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Constantia Flexibles communicates in its Code of Conduct that has to be accepted by all suppliers and subcontractor its commitment to responsible sourcing and requests from its suppliers, to communicate any problem they might become aware of. Constantia also published a Human Slavery and Trafficking Statement to show its commitment to the UK Modern Slavery Act of 2015 (see https://www.cflex.com/quality/code-of-conduct).

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>Constantia Flexibles communicates its commitment to responsible sourcing in its Code of Conduct. The company requests, that the code has to be accepted by all suppliers and subcontractor and requests from them, to respect the international proclaimed human rights. Constantia reserves the right to audit its suppliers at any time to check the compliance with the requirements of the code of conduct (see https://www.cflex.com/quality/code-of-conduct).</p> <p>Constantia is a founding member of the Aluminium Stewardship Initiative ASI and the New Plastics Economy NPEC. Constantia endorses the ethical standards represented by SEDEX (Supplier Ethical Data Exchange - see https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing).</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>Constantia Flexibles communicates its commitment to responsible sourcing in its Code of Conduct. Constantia requests from its suppliers, to respect the international proclaimed human rights, the code has to be accepted by all suppliers and subcontractors. Constantia encourages its first tier suppliers to join SEDEX (see https://www.cflex.com/quality/code-of-conduct and https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing).</p>
7.2 Risk assessment	Conformance	<p>Constantia requests from its suppliers in its general terms and conditions of procurement, to accept the supplier code of conduct. It submits supplier questionnaires that have to be answered and it reserves the right, to conduct audits at the suppliers to check the compliance with these guidelines. Constantia is founding member of the Aluminium Stewardship Initiative ASI and member of the New Plastics Economy NPEC to promote responsible sourcing (see https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing).</p>
7.3 Complaints mechanism	Conformance	<p>Constantia has a code of conduct and a specific code of conduct for suppliers, both are published on the website. It communicates a whistle-blowing hotline in the codes and encourages its suppliers and interested stakeholders, to report incidents, non-compliance with the code of ethics or other incidents that might have an adverse effect on the business of the company through the hotline (see https://www.cflex.com/quality/code-of-conduct).</p>

CRITERION	RATING	COMMENT
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Constantia established a special system for identification and marking of ASI material. It is not only possible, to identify all input and output material along the material flow but also to guarantee, that the material is not mixed. The exact material balance is reported annually in the management review.
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 accounting period is fixed as one year and reported in the ASI management review. If necessary, the material balance could be calculated for any other period.
8.4 Input Percentage	Conformance	Constantia records all delivered material either as ASI or non-ASI material. Based on the ASI identification, a detailed report can be elaborated. The percentage of ASI certified material is reported in the annual management review.
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	Constantia records all delivered material either as ASI or non-ASI material. Based on the ASI identification, a detailed ASI report can be elaborated. At the end of each accounting period, the amount of certified and non-certified material is reported in the management review.
8.7 Output Quantity designation	Conformance	Constantia only uses ASI certified material for the ASI orders of its clients. Therefore it can classify all ASI output as 100% CoC material.
8.8 Output Quantity . Pre-Consumer Scrap	Conformance	All ASI material is marked accordingly. Constantia reports the amount of ASI related scrap in the annual ASI management review.
8.9 Outputs not exceed inputs	Conformance	Constantia uses ASI certified material for the ASI orders of its clients and collects the scrap of ASI production accordingly. There is no risk that the output of ASI certified products and ASI scrap exceeds the input of ASI certified material.

CRITERION	RATING	COMMENT
8.10a Internal Overdraws (not exceed 20%)	Conformance	Constantia regulates in its ASI procedure, that in the case of a force majeure situation, the material accounting system can carry over an internal overdraw of up to 20% of total input quantity of CoC material to the subsequent accounting period.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Constantia defined in its ASI procedure, that in the case of a force majeure situation, the material accounting system can carry over an internal overdraw to the subsequent accounting period. The amount of overdraw must not exceed the amount of material that was part of the force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	Constantia defined in its ASI procedure, that in the case of a force majeure situation, the material accounting system can carry over an internal overdraw to the subsequent accounting period but the amount of material has to be made up within the subsequent material accounting period.
8.11a Positive Balance (carry over)	Conformance	Constantia defined in its ASI procedure that ASI certified material that cannot be used in the current year, may be transferred to the next accounting period. It has to be marked as carry-over material and has to be consumed in this period.
8.11b Positive Balance (expiry)	Conformance	Constantia defined in its ASI procedure that ASI certified material that cannot be used in the current year, may be transferred to the next accounting period. It has to be marked as carry-over material and has to be consumed in that period.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The ASI requirements are implemented in Constantia's ERP-System. If material is marked as ASI material, all relevant information is printed on the according documents (delivery documents, invoices, pallet labels etc.).
9.2a Date of issue	Conformance	All CoC documents carry the date, which is the date of the delivery note.
9.2b Reference number	Conformance	All documents carry reference numbers. The reference number is the batch number (or the order number) of the product that was ordered in ASI-quality. This enables the verification of ASI certified material.
9.2c Issuing Entity	Conformance	All ASI relevant documents carry the entity, address and COC number of Constantia for each shipment.
9.2d Receiving customer	Conformance	All ASI relevant documents carry the identity, address and the COC number of the customer

CRITERION	RATING	COMMENT
		receiving Constantia CoC material (if the customer is another CoC certified entity).
9.2e Responsible employee	Conformance	All documents for the client carry the name of the person, who is responsible for the handling of the order ("Kundenbetreuer"). He/she is the first contact person for all questions and will forward them to the product manager and/or the quality department.
9.2f Conformance statement	Conformance	The documents will carry the required claim "The information provided in the CoC document is in accordance with the ASI CoC standard".
9.2g Type of CoC Material	Conformance	All CoC documents will specify the material as "ASI Aluminium".
9.2h Mass of CoC Material	Conformance	All shipping documents for ASI certified material will carry the information about the amount of CoC material in the shipment.
9.2i Mass of total material	Conformance	All shipping documents for ASI certified material will provide information about the mass of CoC material and the mass of total material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	Not applicable due to the type of business (post casthouse)
9.3b Sustainability Data (passing on)	Conformance	It is not planned to share this information. Detailed Information is provided on request.
9.3c Post-Casthouse ASI Certification status	Conformance	Constantia Flexibles communicates its support for ASI and the status of the certification on its website (see https://www.cflex.com/news/detail/view/aluminium-stewardship-initiative-certifies-constantia-teich)
9.4 Supplementary Information (optional)	Not Applicable	Constantia decided not to provide additional sustainability data on CoC documents.
9.5 Response to verification requests	Conformance	The quality department is responsible for answering questions about the mass balance in close cooperation with product management and sales.
9.6 Error management	Conformance	Constantia has a management system to record, analyse and document all errors, identified and claimed by the customer. This system is extended for ASI. It is regulated, that all errors in the mass balance have to be reported in the management review.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	Constantia established a system where ASI certified material will be ordered as special material with a

CRITERION	RATING	COMMENT
		unique material code. During delivery, the amount of material and the material code are checked before booking the material into the ERP-System.
10.2 Verify consistency with shipments	Conformance	Upon delivery, the consistency of received material with the accompanying documents is checked. This is also done with all ASI material before recording the information in the material accounting system.
10.3 Verify supplier CoC Certification status	Conformance	Constantia has a system in place to check at least on annual basis relevant quality and environment data of its suppliers - including certificates, their validity and any change in the certification scope. The status is also discussed in the annual supplier evaluation and business meetings and further steps discussed (if necessary).
10.4 Error management	Conformance	Constantia checks all delivery upon arrival. If errors, damages or inconsistencies are identified, an internal complaint is opened in the ERP system and managed accordingly. The quality department is responsible for the follow-up, including root-cause analysis and agreed measures with the department heads and the suppliers (if necessary).

11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System . allocation	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.1c No double counting	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2a Date of issue	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2b Reference number	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2c Issuing Entity	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2d Receiving Entity	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2e Conformance statement	Not Applicable	Not applicable as Constantia has decided not to use the credit system.

CRITERION	RATING	COMMENT
11.2f ASI Credits statement	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.2g Quantity	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3a CoC Certification Scope . purchasing ASI Credits	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3b Material Accounting System . purchasing	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3c Expiry	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3d No re-trading	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3e No allocation to physical products	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as Constantia has decided not to use the credit system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as Constantia has decided not to use the credit system.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	Constantia defined in its ASI procedure, that all ASI related claims have to be consistent with the ASI Claims Guide. If a client wants to put ASI related communication on the product, this has to be agreed with ASI in advance.
12.1b Verifiable evidence	Conformance	Constantia defined in its ASI procedure, that there is no communication of the ASI claim outside the CoC documents. If additional claims are made, they have to be consistent with the ASI Claims Guide. If a client wants to put ASI related communication on the product, this has to be agreed with ASI in advance.
12.1c Employee training	Conformance	Constantia defined in its ASI procedure the communication about the ASI claims. It defined the departments and the people that have to be trained about the ASI requirements once a year.

Document Control and Version History

Revision	Date	Notes
0	2 March 2020	Issued (Full Certification)