

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

EUROFOIL

CERTIFICATE
NUMBER

81

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

26 MAY 2020

DATE OF EXPIRY

25MAY 2023

CERTIFIED SINCE

26 MAY 2020

AUTHORISED BY

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

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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 France and Luxembourg facilities.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Eurofoil
ENTITY NAME	Eurofoil France and Eurofoil Luxembourg
CERTIFICATION SCOPE	Eurofoil France and Luxembourg facilities
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">• First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	17 . 18 March 2020
AUDIT REPORT SUBMISSION	15 May 2020
AUDIT SCOPE	<p>The audit scope related to the Chain of Custody process and documentation for Eurofoil operations, Rugles in France and Dudelange in Luxembourg.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Post-Casthouse <p>All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p>At the time of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a desktop exercise, in accordance with the ASI Policy regarding Audits, Audit-Related Travel and Coronavirus.</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.

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- 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.
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CERTIFICATION PERIOD	26 May 2020 . 25 May 2023
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	25 May 2022
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CERTIFICATE NUMBER	81
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Eurofoil Rugles and Dudelage have appropriate ASI performance standard certifications and eligibility for Chain of Custody certifications as confirmed on ASI website https://aluminium-stewardship.org/about-asi/asi-members/eurofoil/ , thereby committing to comply with ASI's membership obligations and the ASI Complaints Mechanism.
1.2 Management system	Conformance	<p>Eurofoil has a defined global objective to achieve ASI CoC certification and a policy which has been communicated to all staff. Relevant personnel have been trained. A system based on existing procedures, data platforms and quality process is utilised to manage CoC material flowing through both facilities. The new ASI requirements are specified in the Quality Manual.</p> <p>This meets the requirements of this criterion, however it is noted that as no CoC material has been supplied (or requested) yet, the first values have been zero and the system was reviewed using dummy data which was randomly sampled and reviewed. The management system should be checked again after CoC material has been received and material accounting period completed during the surveillance audit to reconfirm it operates effectively.</p>
1.3 Management system reviews	Conformance	The Management Systems for ASI CoC are periodically reviewed through integration into current procedures at both sites for the review of Quality, Environment, Safety and Security. This has been checked and confirmed within Performance Standard audits and using evidence from a recent review.
1.4 Management representative	Conformance	Overall conformance with the ASI Chain of Custody Standard rests with the Eurofoil CEOs and is integrated in the Quality conformance requirements. A number of different roles have responsibility for implementing the various aspects of the standard with the main responsibility resting with Quality Managers at each site, as outlined in quality manuals.
1.5 Training	Conformance	The facilities comply with communication and training requirements through existing systems and processes, to which ASI training has been integrated. Communications and training requirements are defined through amendments to existing Quality Manuals. Interviews with personnel

CRITERION	RATING	COMMENT
		confirmed their recent training and involvement in the development of the ASI CoC system.
1.6 Record keeping	Conformance	The Eurofoil facilities have ASI CoC information systems which are up to date and have document retention periods of 5 years, which was confirmed through the review of quality management system documentation. Information security is maintained through existing IT system security procedures. As ASI CoC material is yet to be received at each site, no older samples were available for review therefore this should be checked during the surveillance audit.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Eurofoil have systems in place to report on Input and Output Quantities of CoC Materials over the calendar year when the first material accounting period is complete however the criterion is Not applicable for the first Certification Audit.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Eurofoil have systems in place to report when first material accounting period is complete however criterion is Not applicable for first Certification Audit.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Eurofoil have systems in place to report when first material accounting period is complete however criterion is Not applicable for first Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Eurofoil have systems in place to report the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents, once the first material accounting period is complete, however the criterion is Not applicable for the first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Eurofoil has systems in place to annually report to ASI on this criterion but has not handled any CoC material yet and is yet to report to ASI, therefore this is Not Applicable during the first audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Eurofoil have systems in place to report the quantity of ASI Aluminium allocated to ASI Credits in the calendar year once the first material accounting period is complete, however the criterion is Not applicable for the first Certification Audit.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Eurofoil have systems in place to report quantity of ASI Credits purchased in the calendar year once the first material accounting period is complete, however the criterion is Not applicable for the first Certification Audit.

CRITERION	RATING	COMMENT
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.2a Control of CoC Material	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.2b No further outsourcing	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.2c Risk assessment	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.3 Output Quantity	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.4 Verification and record-keeping	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
2.5 Error management	Not Applicable	This criterion is not applicable as both Eurofoil facilities have no relevant outsourced contractors (they only use contractors for tasks such as maintenance, landscaping and logistics).
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.

CRITERION	RATING	COMMENT
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.
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	Documentation review confirmed that both Eurofoil Casthouses are within the Entity's CoC Certification Scope and are both legally owned by Eurofoil entities.
5.1b ASI Performance Standard . Casthouses	Conformance	Both Eurofoil facilities are certified to the ASI performance standard. See https://aluminium-stewardship.org/about-asi/asi-members/eurofoil/ for certification details.
5.2 Casthouse Products	Conformance	For both sites material flows are fully traceable through processes. Each input is traceable and linked to the production system. CoC inputs are recorded in the same way and the % is tracked through the various process stages. The output from the casthouse - master coils, are allocated a unique ID number allocated on system and over a time period the %CoC material is allocated across the casthouse outputs. All documentation was reviewed during audit to confirm this. As no CoC material has yet been received the information flow has been tracked using dummy data in a trial environment and should be reconfirmed for effectiveness at the Surveillance audit.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope . Post-Casthouse	Conformance	The casthouse and post casthouse activities are part of the same facility at both Rugles and Dudelange.

CRITERION	RATING	COMMENT
		Documentation review shows that Eurofoil holds appropriate legal ownership and the ASI website shows that post casthouse activities are within scope of CoC.
6.1b ASI Performance Standard . Post-Casthouse	Conformance	Both Eurofoil facilities, including post casthouse activities, are certified to the ASI Performance Standard, see https://aluminium-stewardship.org/about-asi/asi-members/eurofoil/
6.1c Sourcing ASI Aluminium	Conformance	The facilities Materials Accounting Systems and CoC management system within Quality Management Systems as well as site visits and documentation reviews provide evidence that confirm that only CoC material that flows through Eurofoil casthouses, enters the post casthouse process stages and that this is within ASI CoC entity scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Review of the policy confirmed it covers all the requirements of ASI Criteria 7, including Anti-corruption, responsible sourcing, Human Rights Due diligence, Conflict Affected and High-Risk Areas. Procurement team required to send out policy and risk assessment questionnaire for each supplier. They have to declare if they are compliant with policy. 3 parts of questionnaire: supplier information, questionnaire and summary showing compliance. There is a mechanism in place to chase suppliers to complete the questionnaire and this is taken into account in supplier review.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Review of the policy confirmed it covers all the requirements of ASI Criteria 7, including Anti-corruption, responsible sourcing, Human Rights Due diligence, Conflict Affected and High-Risk Areas. Procurement team required to send out policy and risk assessment questionnaire for each supplier. They have to declare if they are compliant with policy. 3 parts of questionnaire: supplier information, questionnaire and summary showing compliance. There is a mechanism in place to chase suppliers to complete the questionnaire and this is taken into account in supplier review.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	Review of the policy confirmed it covers all the requirements of ASI Criteria 7, including Anti-corruption, responsible sourcing, Human Rights Due diligence, Conflict Affected and High-Risk Areas. Procurement team required to send out policy and risk assessment questionnaire for each supplier. They have to declare if they are compliant with

CRITERION	RATING	COMMENT
		policy. 3 parts of questionnaire: supplier information, questionnaire and summary showing compliance. There is a mechanism in place to chase suppliers to complete the questionnaire and this is taken into account in supplier review.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	Review of the policy confirmed it covers all the requirements of ASI Criteria 7, including Anti-corruption, responsible sourcing, Human Rights Due diligence, Conflict Affected and High-Risk Areas. Procurement team required to send out policy and risk assessment questionnaire for each supplier. They have to declare if they are compliant with policy. 3 parts of questionnaire: supplier information, questionnaire and summary showing compliance. There is a mechanism in place to chase suppliers to complete the questionnaire and this is taken into account in supplier review.
7.2 Risk assessment	Conformance	Eurofoil has a central procurement function for metals and has implemented processes to assess the risks of non-compliance with its responsible sourcing policy by its suppliers of Non-CoC Material and Recyclable Scrap Material. It is developing an understanding of its supplier risks but has limited information currently to provide a complete picture. There is evidence of chasing suppliers and of Eurofoil taking reasonable steps to improve. This criterion should be reviewed during surveillance audit.
7.3 Complaints mechanism	Conformance	Both Eurofoil facilities have complaints mechanisms that allow interested parties to voice concerns about compliance with its responsible sourcing policy. The Facilities should add direct information about accessing complaints mechanism on customer CoC documentation. They should include a link to its complaints mechanism covering responsible sourcing on website.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	System reviews showed that Dudelage and Rugles utilise different platforms to track quality. Additional data fields have been added to existing process information and dummy data used in trials to confirm functionality. These are used to track ASI CoC material inputs and outputs by mass. As there have not been any CoC materials passing through the facilities yet, effectiveness needs to be reconfirmed at subsequent surveillance audits.

CRITERION	RATING	COMMENT
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	Minor Non-Conformance	Testimonial and documentation review confirmed that both facilities have Material Accounting Systems where there is a Material Accounting Period (MAP) of a Calendar year. Both facilities' systems are able to deliver data covering the MAP, however a minor non-conformance was raised as Dudelange was unable to demonstrate that it had documented its MAP and will now do so in its Quality Manual.
8.4 Input Percentage	Conformance	Both facilities have materials reception and input inventory processes which take into account the % input CoC from the documentation provided by the supplier. Where CoC material is only identified by weight, this calculation is completed manually and added to the material accounting system.
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 material accounting systems used by the facilities were reviewed to confirm that they can track the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Material, by mass.
8.7 Output Quantity designation	Conformance	Provisions have been made for reporting from the material accounting systems at both facilities to be able to show the mass of material outputs and sales of non-CoC material, and the mass of the outputs and sales of 100% CoC materials. As there have not been any CoC materials passing through the facilities yet, this needs to be reconfirmed at subsequent surveillance audits.
8.8 Output Quantity . Pre-Consumer Scrap	Conformance	The Material Accounting Systems used by both facilities enable any Pre-Consumer Scrap from its processing to be identified and tracked. This means that Eligible CoC Scrap inputs and outputs will also be tracked. As there have not been any CoC materials passing through the facilities yet, this needs to be reconfirmed at subsequent surveillance audits.

CRITERION	RATING	COMMENT
8.9 Outputs not exceed inputs	Conformance	Both Facilities Material Accounting Systems have controls in place to ensure the total output of CoC Material and/or Eligible Scrap does not exceed the Input Percentage of CoC Material over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	<p>At the moment the situation does not enable an overdraw as it only balances the exact inputs to the outputs.</p> <p>The system has the ability to show this on annual reporting should there be a business need force majeure situation and when CoC material requests start coming in. There is provision for such a situation in the procedures and process documentation.</p> <p>As there have not been any CoC materials passing through the facilities yet, effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
8.10b Internal Overdraws (not exceed affected amount)	Minor Non-Conformance	<p>Procedures in both facilities material accounting system specifications show responsibilities are allocated to manage this circumstance but a review of documentation suggests it needs to be updated to be clearer on the specific requirements of this clause and the circumstances under which it may arise, a minor non-conformance has been raised to reflect this.</p> <p>As there have not been any CoC materials passing through the facilities yet, or such circumstances, effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
8.10c Internal Overdraws (period to make up)	Conformance	Eurofoil has developed procedures which take into account a Force Majeure situation (although this is not defined) and which detail that any overdraw shall be made up in the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	<p>Both facilities Material Accounting System specification documentation clearly identifies the requirement to record and report any carry over of a Positive Balance.</p> <p>As there have not been any CoC materials passing through the facilities yet, effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
8.11b Positive Balance (expiry)	Conformance	<p>Both facilities Material Accounting System specification documentation clearly identifies the requirement to record and report any carry over of a Positive Balance and indicate an expiry period.</p> <p>As there have not been any CoC materials passing through the facilities yet, no positive balances have</p>

CRITERION	RATING	COMMENT
		been generated and this should be reviewed at subsequent surveillance audits.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Minor Non-Conformance	The Facilities maintain records on ASI CoC certified customers and suppliers. It understands the requirement to issue CoC documentation with Rugles able to issue documentation when demand arises. Dudelage is planning to move into complete conformance with this criterion when production release version of CoC changes to IT system is implemented which will enable issuance of CoC documentation.
9.2a Date of issue	Conformance	The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.
9.2b Reference number	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2c Issuing Entity	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing</p>

CRITERION	RATING	COMMENT
		<p>through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2d Receiving customer	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2e Responsible employee	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2f Conformance statement	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>

CRITERION	RATING	COMMENT
9.2g Type of CoC Material	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2h Mass of CoC Material	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.2i Mass of total material	Conformance	<p>The specifications in place at both sites include a reporting template in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and covers: Date of Issue, reference number, Name address and CoC certification number of issuing entity, Name address and CoC certification number of receiving entity, verification contact, conforming statement, type of shipment, Mass of CoC material and Mass of Total Material.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.3a Sustainability Data (optional)	Conformance	<p>Both facilities have verified LCA documents which provide overall global warming potential. This is designed around customer requests and is available on their public websites at:</p>

CRITERION	RATING	COMMENT
		<p>http://www.eurofoil.com/Documents/EnvironmentAnnualReportDudelange2018.pdf and http://www.eurofoil.com/Documents/EnvironmentAnnualReportRugles2018.pdf</p> <p>Provision of this data is optional. It is not completely consistent with the format required by this criterion as the facilities are not yet able to break the data down to the specific requirements at Casthouse and Post Casthouse levels but provide combined annualised data instead. However the data provided is useful to their customers.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.3b Sustainability Data (passing on)	Conformance	<p>Both facilities have verified LCA documents which provide overall global warming potential. This is designed around customer requests and is available on their public websites at:</p> <p>http://www.eurofoil.com/Documents/EnvironmentAnnualReportDudelange2018.pdf and http://www.eurofoil.com/Documents/EnvironmentAnnualReportRugles2018.pdf</p> <p>This data is not completely consistent with the format required by this criterion as the facilities are not yet able to break the data down to the specific requirements at Casthouse and Post Casthouse levels but provide combined annualised data instead.</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore effectiveness of process needs to be reconfirmed at subsequent surveillance audits.</p>
9.3c Post-Casthouse ASI Certification status	Conformance	<p>Both facilities use templates based on ASI requirements and have an optional space for other sustainability information. Performance Standard certification status is provided on this template as this is known through customer and supplier relationship and verifiable through the Eurofoil website</p> <p>http://www.eurofoil.com/us/about_us/site_location/Dudelange_L.htm and the ASI website https://aluminium-stewardship.org/about-asi/asi-members/eurofoil/ .</p> <p>As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore</p>

CRITERION	RATING	COMMENT
		effectiveness of process needs to be reconfirmed at subsequent surveillance audits.
9.4 Supplementary Information (optional)	Conformance	The procedures in place at both facilities indicate that the IT system will issue CoC documents to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. This document content will include a field for supplementary information (in accordance with template information introduced in Appendix 1) which is supportable by objective evidence. As there have not been any CoC materials passing through the facilities yet, or customer demand, no CoC documentation has been issued. Therefore, effectiveness of process needs to be reconfirmed at subsequent surveillance audits.
9.5 Response to verification requests	Conformance	The procedures in place at both facilities show that document content will be issued automatically from IT system; verification that the system delivers accurate data is done by the Quality department before releasing it to the Sales department. In case of error in the issuing of initial CoC documents, manual corrections will be done by authorized persons and a new CoC can be submitted again. Any concerns about CoC document information can be raised through normal relationships or through the defined complaints procedure.
9.6 Error management	Conformance	Existing traceability and complaints mechanisms are in place at both facilities for the purposes of other certification requirements. Calculations are automatically completed within the system, with controls in place so they cannot be altered - therefore no opportunity for manual error and data can be fully traceable. If there is a potential error raised this can be communicated via existing contacts at both facilities or via the complaints mechanism. Procedures are in place to rectify any errors made and take steps to correct deficiency.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	Eurofoil has adequate systems in place to ensure that all required information in received CoC Documents has been included. Metal procurement is centrally managed for both facilities. Pre-approvals and specifications are checked to ensure incoming materials meet business needs including for CoC material and that checks to ensure all ASI required data are made. This was confirmed through process and document review. As there have not been any CoC materials passing

CRITERION	RATING	COMMENT
		through the facilities yet, effectiveness needs to be reconfirmed at subsequent surveillance audits.
10.2 Verify consistency with shipments	Conformance	Eurofoil has adequate systems in place to ensure that all required information in received CoC Documents has been included. Metal procurement is centrally managed for both facilities. Pre-approvals and specifications are checked to ensure incoming materials meet business needs including for CoC material and that checks to ensure all ASI required data are made and that the incoming shipments are consistent with the documentation. This was confirmed through process and document review. As there have not been any CoC materials passing through the facilities yet, effectiveness needs to be reconfirmed at subsequent surveillance audits.
10.3 Verify supplier CoC Certification status	Conformance	The Quality Manager at Dudelange checks incoming ASI email updates and weekly checks on the ASI website to keep a list of ASI membership and that current certifications are up to date. This list includes suppliers and customers of Eurofoil.
10.4 Error management	Conformance	Both facilities operate checks on incoming materials. Firstly pre-approvals including regarding ASI criteria are made by the Metal Procurement Manager. If an error is made and incoming shipments do not conform to quality and CoC criterion agreed, materials are refused or stored and then returned if they cannot be used. There are procedures in place to record the errors and develop actions to avoid a recurrence.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System . allocation	Conformance	Rugles has developed its system to allocate excess CoC material to credits and the Dudelange system would also enable credits to be allocated should excess material be present. Currently no demand from customers for CoC material and no Credits are being issued or purchased. This criterion should be re-evaluated during surveillance audit.
11.1b Link to Casthouse Products	Conformance	The systems set up at both Eurofoil facilities enable a unique number to be allocated to each coil produced and in turn associated with the % of CoC material handled each day, i.e. a % of coils will be CoC material. The systems will be able to allocate this % to ASI credits if required.

CRITERION	RATING	COMMENT
11.1c No double counting	Conformance	The systems set up at both Eurofoil facilities enable a unique number to be allocated to each coil produced and in turn associated with the % of CoC material handled each day, i.e. a % of coils will be CoC material. The systems ensure that the material cannot be double counted.
11.1d No Positive Balance for ASI Credits	Conformance	The systems set up at both Eurofoil facilities enable ASI credits to be calculated. Procedures state that any positive balance of credit material cannot be carried over to the subsequent Material Accounting Period.
11.2a Date of issue	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
11.2b Reference number	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
11.2c Issuing Entity	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>

CRITERION	RATING	COMMENT
11.2d Receiving Entity	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
11.2e Conformance statement	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits, conformance statement.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
11.2f ASI Credits statement	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits. Revisions were made to documentation during the auditing period to include a conforming statement about certificate not being able to be re-traded on the credit certificate template.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.</p>
11.2g Quantity	Conformance	<p>The specifications of the Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC Credits which include: Date of issue, reference number linked to material accounting system, Identify, address contact email and CoC certification number of the issuing and receiving parties and the quantity of the credits.</p> <p>Currently there is no demand from customers for CoC material and no Credits are being issued or</p>

CRITERION	RATING	COMMENT
		purchased. Effectiveness needs to be reconfirmed at subsequent surveillance audits.
11.3a CoC Certification Scope . purchasing ASI Credits	Conformance	The Quality Manager at Dudelange is responsible for keeping an up to date list of ASI members based on information issued by ASI via emails and on its website. The list has information to confirm purchasing entities CoC certification scope.
11.3b Material Accounting System . purchasing	Conformance	The specifications of the Material Accounting and reporting system include a reference to allocating credits and to purchasing credits. This has not been able to be tested as no credits have been purchased.
11.3c Expiry	Conformance	The specifications of the Material Accounting and reporting system include references to allocating credits and to purchasing credits. This includes references that they expire at the end of the accounting period and cannot be carried over. This has not been able to be tested as no credits have been purchased and should be tested at subsequent surveillance audits.
11.3d No re-trading	Conformance	The specifications of the Material Accounting and Reporting system include information stating credits cannot be re-traded.
11.3e No allocation to physical products	Conformance	The specifications of the Material Accounting and reporting system include information covering credits not being allocated to physical products or otherwise claimed as ASI Aluminium. As no CoC material has been traded, it has not been possible to check actual certificates or records.
11.3f Verify supplier CoC Certification status	Conformance	Quality Manager at Dudelange reviews ASI emails and information on the website to maintain an up to date list of ASI certifications and scopes. It is monitored for any changes.
11.3g Five years maximum for ASI Credits purchasing	Conformance	The procedure and documented information provides controls to ensure that any ASI credits purchased are only done so for a maximum of 5 years.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Not Applicable	This criterion is not applicable as both facilities and the business do not make any additional claims about ASI membership or materials beyond the template CoC documents.
12.1b Verifiable evidence	Not Applicable	This criterion is not applicable as both facilities and the business do not make any additional claims

CRITERION	RATING	COMMENT
		about ASI membership or materials beyond the template CoC documents.
12.1c Employee training	Not Applicable	This criterion is not applicable as both facilities and the business do not make any additional claims about ASI membership or materials above the template CoC documents.

Document Control and Version History

Revision	Date	Notes
0	22 May 2020	Issued (Full Certification)