

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# HYDRO BAUXITE & ALUMINA

CERTIFICATE  
NUMBER

29

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

29 MAY 2019

DATE OF EXPIRY

28 MAY 2022

CERTIFIED SINCE

29 MAY 2019

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Hydro Bauxite & Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

### OVERVIEW

|                         |  |
|-------------------------|--|
| MEMBER NAME             | Hydro  |
| ENTITY NAME             | Hydro Bauxite & Alumina  |
| CERTIFICATION SCOPE     | Hydro Bauxite & Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).   |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li></ul>  |
| ASI STANDARD            | Chain of Custody Standard V1   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Certification Audit (26 – 29 November, 7 February 2019, 15 March 2019)</li><li>• Surveillance Audit (15 October – 13 November 2020)</li></ul>  |
| AUDIT FIRM              | DNV GL   |
| AUDIT DATE              | <ul style="list-style-type: none"><li>• 26 – 29 November, 7 February 2019, 15 March 2019 (Certification Audit)</li><li>• 15 October – 13 November 2020 (Surveillance Audit)</li></ul>  |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>• 24 April 2019 (Certification Audit)</li><li>• 21 January 2021 (Surveillance Audit)</li></ul>   |
| AUDIT SCOPE             | <p><u>Certification Audit (26 – 29 November, 7 February 2019, 15 March 2019):</u></p> <p>The audit scope covered Hydro Bauxite &amp; Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite &amp; Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (15 October – 13 November 2020):</u></p> |

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The audit scope covered Hydro Bauxite & Alumina Chain of Custody certification including the Paragominas bauxite mine (Brazil), Alunorte alumina refinery (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and Hydro Corporate Office (Norway).

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

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

At the time of the audit (October – November 2020), access to the sites was not possible due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

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AUDIT  
OUTCOME

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION  
PERIOD

29 May 2019 – 28 May 2022

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

28 May 2022

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CERTIFICATE  
NUMBER

29

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## SUMMARY OF FINDINGS

| CRITERION                                  | RATING      | COMMENT  |
|--|-------------|--|
| 1 MANAGEMENT SYSTEM AND RESPONSIBILITIES   |             |  |
| 1.1 ASI membership                         | Conformance | The Entity is an ASI Member committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Bauxite Mining and Alumina Refining category and has held certification on the Performance Standard and Chain of Custody Standard since 2019.   |
| 1.2 Management system                      | Conformance | The Entity has created a Management System for handling ASI Material and use of ASI logo. A Management System Documentation Procedure is developed. The procedure describes objective, scope, responsibilities and the general system and workflow which gives governance of the CoC System.                                     |
| 1.3 Management system reviews              | Conformance | The Entity has established procedures and processes to comply with ASI CoC Criteria regarding the periodic review of the Management System and associated updates as required. A yearly review following the regular Management Review process is established. Last internal review was finalized and reported October 30, 2020. |
| 1.4 Management representative              | Conformance | The Entity has appointed the Marketing Manager as the responsible person for ASI CoC Standard implementation and conformance with the requirements in the Standard. A nominated team, the Normative Committee, is responsible for the continuous management of the ASI Certification system.                                     |
| 1.5 Training                               | Conformance | The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the CoC Standard. Adequate training is performed.  |
| 1.6 Record keeping                         | Conformance | The Entity maintains up-to-date records covering all applicable requirements of the CoC Standard. The Entity's Standard Operating Procedures define the retention time as required by the ASI CoC Standard.  |
| 1.7a Reporting to ASI (Inputs and Outputs) | Conformance | The Entity's operating procedure specifies that the Entity will report Input and Output Quantities of CoC Material to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements. Last report was submitted on March 31, 2020.   |
| 1.7b Reporting to ASI (Input Percentage)   | Conformance | The Entity's operating procedure specifies that the Entity will report Input Percentage to ASI Secretariat   |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | within 3 months after the end of each calendar year which conforms to ASI CoC requirements. Last Report submitted to ASI on March 31, 2020.   |
| 1.7c Reporting to ASI (Positive Balance)   | Conformance    | The Entity's operating procedure specifies that the Entity will report any Positive Balance to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements. Last Report submitted to ASI on March 31, 2020 with a Positive Balance of Alumina. |
| 1.7d Reporting to ASI (Internal Overdraw)  | Conformance    | The Entity's operating procedure specifies that the Entity will report any Internal Overdraw to ASI Secretariat within 3 months after the end of each calendar year which conforms to ASI CoC requirements. Last Report submitted to ASI on March 31, 2020 with no Internal Overdraw.         |
| 1.7e Reporting to ASI (Eligible Scrap)   | Not Applicable | The Entity does not engage in Aluminium Remelting/Refining to produce Recycled Aluminium.   |
| 1.7f Reporting to ASI (ASI Credits from Casthouses)                                    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 1.7g Reporting to ASI (ASI Credits purchased)  | Not Applicable | Not applicable as the Entity does not intend to utilise the ASI Market Credits System.  |
| <b>2 OUTSOURCING CONTRACTORS</b>   |                |   |
| 2.1 Outsourcing Contractors in CoC Certification Scope                                 | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.2a Control of CoC Material   | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.2b No further outsourcing  | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.2c Risk assessment   | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.3 Output Quantity  | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.4 Verification and record-keeping  | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| 2.5 Error management   | Not Applicable | The Criterion is not applicable as the Entity does not have any Outsourcing Contractors.  |
| <b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b> |                |   |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
| 3.1a CoC Certification Scope - Bauxite Mining                          | Conformance    | The Entity is engaged in Bauxite Mining and is part of the Entity's Certification Scope for Chain of Custody Certification                             |
| 3.1b ASI Performance Standard - Bauxite Mining                         | Conformance    | The Entity is engaged in Bauxite Mining and holds an ASI Performance Standard and Chain of Custody Certification.                                      |
| 3.2a CoC Certification Scope - Alumina Refining                        | Conformance    | The Entity is engaged in Alumina Refining and is part of the Entity's Certification Scope for Chain of Custody and Performance Standard Certification. |
| 3.2b ASI Performance Standard - Alumina Refining                       | Conformance    | The Entity is engaged in Alumina Refining and holds an ASI Performance Standard Certification.   |
| 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.  |
| 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.  |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
| 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM                             |                |  |
| 6.1a CoC Certification Scope - Post-Casthouse                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.1b ASI Performance Standard - Post-Casthouse                           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.1c Sourcing ASI Aluminium  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL         |                |  |
| 7.1a Responsible sourcing policy (anti-corruption)                       | Conformance    | The Entity has established a Supplier Code of Conduct addressing Anti-Corruption. The Code is mandatorily signed by Suppliers.<br><a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf</a>  |
| 7.1b Responsible sourcing policy (responsible sourcing)                  | Conformance    | The Entity has established a Supplier Code of Conduct addressing Responsible Sourcing. The Code is mandatorily signed by Suppliers and due diligence risk assessment is always done prior to starting business with the Entity.<br><a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf</a>   |
| 7.1c Responsible sourcing policy (human rights due diligence)            | Conformance    | The Entity has established a Supplier Code of Conduct addressing Human Rights Due Diligence. The Code is mandatorily signed by Suppliers and due diligence risk assessment is always done prior to starting business with the Entity.<br><a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf</a>   |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance    | The Entity has established a Supplier Responsible Sourcing framework including assessment of Conflict Affected and High Risk Areas. The Supplier Code of Conduct is mandatorily signed by Suppliers and due diligence risk assessment is always conducted prior to starting business with the Entity.<br><a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/hydro-supplier-code-of-conduct2.pdf</a> |
| 7.2 Risk assessment  | Conformance    | The Entity has established a Supplier Code of Conduct including a Risk Assessment and qualification process. The Code is mandatorily signed by Suppliers and a due diligence risk assessment is always conducted prior to starting business with the Entity.   |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 7.3 Complaints mechanism                              | Conformance    | The Entity has established a complaints mechanism allowing to raise concerns through different channels, such as the company website: <a href="https://www.hydro.com/en/contact-us">https://www.hydro.com/en/contact-us</a> or email: <a href="mailto:Compliance@hydro.com">Compliance@hydro.com</a><br>Alunorte site also holds a valid SA8000 certificate. |
| 8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM |                |  |
| 8.1 Material Accounting System                        | Conformance    | The Entity has a Material Accounting System developed to govern and report on Input Quantity as well as Output Quantity of CoC Material and Non-CoC Material, by mass. The accounting system is well implemented and has been operational since 2019.  |
| 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 uses the period January to December as their Material Accounting Period. This is in line with the requirement in the Standard.  |
| 8.4 Input Percentage                                  | Conformance    | The Entity's Material Accounting System calculates the Input Percentage in line with the requirements in the Standard.   |
| 8.5 Input Percentage (Aluminium Re-Melting/Refining)  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 8.6 Output Quantity determination                     | Conformance    | The Entity's Material Accounting System calculates the Output Quantity by mass in line with the requirements in the Standard.  |
| 8.7 Output Quantity designation                       | Conformance    | The Entity's Output Quantity of CoC Material is designated as 100%. The Material Accounting System is designed to control this and the necessary training has been given.  |
| 8.8 Output Quantity - Pre-Consumer Scrap              | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope as there is no Pre-Consumer Scrap produced.   |
| 8.9 Outputs not exceed Inputs                         | Conformance    | The Entity's Material Accounting System and internal control mechanisms assure that Outputs do not exceed Inputs, in line with requirements in the Standard.   |



| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| 8.10a Internal Overdraws (not exceed 20%)             | Conformance | The Entity has established procedures and systems to control the Material Accounting Period and make sure Internal Overdraws do not exceed 20%.  |
| 8.10b Internal Overdraws (not exceed affected amount) | Conformance | The Entity's Material Accounting System and internal control mechanisms assure the Internal Overdraw does not exceed the amount of CoC Material affected by a force majeure situation.   |
| 8.10c Internal Overdraws (period to make up)          | Conformance | The Entity's Material Accounting System and internal control mechanisms assure 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 and internal control mechanisms will assure that a Positive Balance is carried over to the subsequent Material Accounting Period.  |
| 8.11b Positive Balance (expiry)                       | Conformance | The Entity's Material Accounting System and internal control mechanisms will assure that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn.          |
| 9 ISSUING COC DOCUMENTS                               |             |  |
| 9.1 Shipments and transfers                           | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material.   |
| 9.2a Date of issue                                    | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the Date of Issue.   |
| 9.2b Reference number                                 | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information including a Reference Number and material code.   |
| 9.2c Issuing Entity                                   | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the Issuing Entity.  |
| 9.2d Receiving customer                               | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the Receiving Customer.  |
| 9.2e Responsible employee                             | Conformance | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the Issuing Entity and the Responsible Employees of the Entity who can verify information in the CoC Document. |

| CRITERION                                     | RATING         | COMMENT   |
|---|----------------|---|
| 9.2f Conformance statement                    | Conformance    | The Entity has developed documents and records to follow shipments and transfer of CoC Material which includes a Statement of Conformance related to ASI requirements.                                    |
| 9.2g Type of CoC Material                     | Conformance    | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on Type of CoC Material shipped.   |
| 9.2h Mass of CoC Material                     | Conformance    | The Entity has developed documents and records to follow shipments and transfer of CoC material with information on Mass of CoC Material in the shipment.   |
| 9.2i Mass of total material                   | Conformance    | The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on Mass of Total Material in the shipment.   |
| 9.3a Sustainability Data (optional)           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 9.3b Sustainability Data (passing on)         | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 9.3c Post-Casthouse ASI Certification status  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 9.4 Supplementary Information (optional)      | Not Applicable | The Entity is not planning to add Supplementary Information.  |
| 9.5 Response to verification requests         | Conformance    | The Entity has close co-operation with clients purchasing Chain of Custody Material. Reports are issued on a regular basis and can support any request for further verification of information if needed. |
| 9.6 Error management                          | Conformance    | The Entity has developed an Error Management Procedure. No errors or claims has been recorded since delivery of Chain of Custody Material commenced in June 2019.   |
| 10 RECEIVING COC DOCUMENTS                    |                |   |
| 10.1 Verify required information included     | Conformance    | The Entity has a management system procedure and established routines to regularly check and verify received CoC Documents.   |
| 10.2 Verify consistency with shipments        | Conformance    | The Entity has a management system procedure and established routines to regularly check the consistency of CoC Documents before recording information in the Material Accounting System.                 |
| 10.3 Verify supplier CoC Certification status | Conformance    | The Entity has a Management System procedure and established routines to regularly check the ASI website to verify validity and scope of supplier's ASI CoC Certification Status.                         |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| 10.4 Error management                                  | Conformance    | The Entity has developed an Error Management procedure to respond to the discovery of an error in shipping of CoC Material. |
| 11 MARKET CREDITS SYSTEM: ASI CREDITS                  |                |   |
| 11.1a Material Accounting System - allocation          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.1b Link to Casthouse Products                       | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.1c No double counting                               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.1d No Positive Balance of ASI Credits               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2a Date of issue                                    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2b Reference number                                 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2c Issuing Entity                                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2d Receiving Entity                                 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2e Conformance statement                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2f ASI Credits statement                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.2g Quantity   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.3a CoC Certification Scope - purchasing ASI Credits | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.3b Material Accounting System - purchasing          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.3c Expiry   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.3d No re-trading                                    | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 11.3e No allocation to physical products               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
| 11.3f Verify supplier CoC Certification status     | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 11.3g Five year maximum for ASI Credits purchasing | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| <b>12 CLAIMS AND COMMUNICATIONS</b>                |                |  |
| 12.1a ASI Claims Guide                             | Conformance    | The Entity's claims and/or representations about CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is done in a manner and form consistent with the ASI Claims Guide.   |
| 12.1b Verifiable evidence                          | Conformance    | The Entity's claims and/or representations about CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is done in a manner and form consistent with the ASI Claims Guide and is supported by Verifiable Evidence.                     |
| 12.1c Employee training                            | Conformance    | The Entity's claims and/or representations about CoC Material beyond what it contained in CoC Documents, is coordinated from the Head Office to assure this is done in a manner and form consistent with the ASI Claims Guide. Training for key personnel has been undertaken accordingly. |

#### **Document Control and Version History**

| Revision | Date            | Notes  |
|----------|-----------------|--|
| 0        | 29 May 2019     | Issued (Full Certification)  |
| 1        | 1 February 2021 | Surveillance Audit   |
| 2        | 3 June 2021     | Correction to Public Headline Statement for Criteria in Section 11 |