

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTANTIA TEICH (AUSTRIA)

CERTIFICATE
NUMBER

78

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

30 JULY 2021

DATE OF EXPIRY

29 JULY 2024

CERTIFIED SINCE

2 MARCH 2020

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark grey background.

Aluminium Stewardship Initiative Ltd
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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

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 (Austria)
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">• Re-Certification Audit (30 – 31 March 2021)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• Initial Certification Audit (15 – 16 October 2019)• Re-Certification Audit (30 - 31 March 2021)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 11 February 2020 (Initial Certification Audit)• 9 June 2021 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (15 – 16 October 2019)</u></p> <p>The audit scope included the rolling of aluminium foil to basic and final conversion at the Constantia Teich facility in Weinburg, Austria</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (30 – 31 March 2021)</u></p> <p>The audit scope included the rolling of aluminium foil to basic and final conversion at the Constantia Teich facility in Weinburg, Austria.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p>At the time of the audit (March 2021), access to the site was not limited, due to COVID-19 related travel restrictions. The Audit has been undertaken as a</p>

'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

- Certification
-

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

30 July 2021 – 29 July 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

29 July 2024

CERTIFICATION
NUMBER

78

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	<p>Constantia is a founding member of the Aluminium Stewardship Initiative and was the third company worldwide certified against the ASI Performance Standard. It communicates its status on the Constantia Flexibles website:</p> <p>https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing</p> <p>It can also be found on the ASI website:</p> <p>https://aluminium-stewardship.org/about-asi/asi-members/constantia-flexibles-international-gmbh/</p>
1.2 Management system	Conformance	<p>Constantia Teich has a well-established integrated management system. The site is certified against ISO 14001, BRC, FSC, Kosher, Halal and other standards, see information on the website:</p> <p>https://www.cflex.com/about-us/quality/</p> <p>ASI requirements are covered by the existing management systems and additional policies and procedures.</p>
1.3 Management system reviews	Conformance	<p>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.</p>
1.4 Management representative	Conformance	<p>The Managing Director of the Constantia Teich plant is the management representative for ASI. The role is supported by headquarters and local staff in the implementation of ASI requirements.</p>
1.5 Training	Conformance	<p>All employees have to participate in annual e-learnings 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.</p>
1.6 Record keeping	Conformance	<p>Legal requirements define the retention time of documents. This includes the five years required by the ASI Chain of Custody Standard.</p>
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	<p>Constantia Teich defined, that the reporting of ASI Material has to be submitted to ASI within the first three months of the following year.</p>
1.7b Reporting to ASI (Input Percentage)	Conformance	<p>Constantia Teich 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 in use.</p>

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Conformance	Constantia Teich defined to report to ASI within the first three months of the following year all ASI related 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 Teich 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 Teich 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 the Entity 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.

CRITERION	RATING	COMMENT
		Constantia Teich defined in the process instruction, that a company where the material is outsourced to, has to provide information about the input and output of ASI certified material.
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.

CRITERION	RATING	COMMENT
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.
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 Coc 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 CoC Certified Entities. If the supplier is not yet certified against ASI, Constantia Teich commits the supplier 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 in its Code of Conduct that has to be accepted by all suppliers and subcontractors. The Code is available on the website: https://www.cfex.com/quality/code-of-conduct
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 Flexibles also published a Human

CRITERION	RATING	COMMENT
		<p>Slavery and Trafficking Statement to show its commitment to the UK Modern Slavery Act of 2015: https://www.cflex.com/quality/code-of-conduct</p>
<p>7.1c Responsible sourcing policy (human rights due diligence)</p>	<p>Conformance</p>	<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: https://www.cflex.com/quality/code-of-conduct</p> <p>Constantia is a founding member of the Aluminium Stewardship Initiative and the New Plastics Economy NPEC. Constantia endorses the ethical standards represented by SEDEX (Supplier Ethical Data Exchange): https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing</p>
<p>7.1d Responsible sourcing policy (conflict affected and high risk areas)</p>	<p>Conformance</p>	<p>Constantia Flexibles communicates its commitment to responsible sourcing in its Code of Conduct: https://www.cflex.com/quality/code-of-conduct</p> <p>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 (Supplier Ethical Data Exchange): https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing</p>
<p>7.2 Risk assessment</p>	<p>Conformance</p>	<p>Constantia requests from its suppliers in its general terms and conditions of procurement, to accept the Code of Conduct for Suppliers. 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 a founding member of the Aluminium Stewardship Initiative and member of the New Plastics Economy NPEC to promote responsible sourcing: https://www.cflex.com/responsibility/social-responsibility/responsible-ethical-sourcing</p>
<p>7.3 Complaints mechanism</p>	<p>Conformance</p>	<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</p>

CRITERION	RATING	COMMENT
		that might have an adverse effect on the business of the company through the hotline: https://www.cflex.com/quality/code-of-conduct
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.
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

CRITERION	RATING	COMMENT
		output of ASI certified products and ASI scrap exceeds the input of ASI certified material.
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 (such as delivery documents, invoices, pallet labels).
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.

CRITERION	RATING	COMMENT
9.2d Receiving customer	Conformance	All ASI relevant documents carry the identity, address and the CoC number of the customer 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	ASI documents carry the 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	Detailed Information is provided on request but it is not planned to provide this information on all CoC Documents.
9.3c Post-Casthouse ASI Certification status	Conformance	Constantia Flexibles communicates its support for ASI and the status of the certification on its website: 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.

CRITERION	RATING	COMMENT
10.1 Verify required information included	Conformance	Constantia established a system where ASI certified material is ordered as special material with a 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 unique- including certificates, their validity and any change in the certification scope - this was extended for ASI Material.
10.4 Error management	Conformance	Constantia checks all deliveries 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)
1	30 July 2021	Re-Certification Audit (undertaken prior to expiry of initial 3 year certification period to align timing with the Performance Standard re-certification period); Update to Audit Scope format for Initial Certification Audit.