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ASI CERTIFICATION  
PERFORMANCE  
STANDARD

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PRESENTED TO

# EUROFOIL FRANCE

CERTIFICATE  
NUMBER

21

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

14 JANUARY 2020

DATE OF EXPIRY

13 JANUARY 2023

CERTIFIED SINCE

11 APRIL 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a 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](http://www.aluminium-stewardship.org)**

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CERTIFICATION SCOPE

Eurofoil France site in Rugles (France).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Eurofoil
ENTITY NAME	Eurofoil France
CERTIFICATION SCOPE	Eurofoil France site in Rugles (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit (12 – 13 February 2019)</li><li>• Surveillance Audit (25 November 2019)</li><li>• Surveillance Audit (2 – 3 June 2021)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 12 - 13 February 2019 (Initial Certification Audit)</li><li>• 25 November 2019 (Surveillance Audit)</li><li>• 2 - 3 June 2021 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 2 March 2019 (Initial Certification Audit)</li><li>• 5 December 2019 (Surveillance Audit)</li><li>• 23 June 2021 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (12 - 13 February 2019)</u></p> <p>The audit scope covered the Eurofoil France site in Rugles (France) and associated activities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Semi-Fabrication</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit – provisional certification (25 November 2019)</u></p> <p>The audit scope covered the Eurofoil France site in Rugles (France) and associated activities.</p> <p>Supply chain activities included in the audit scope:</p>

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- Semi-Fabrication

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

Surveillance Audit (2 – 3 June 2021)

The audit scope covered the Eurofoil France site in Rugles (France) and associated activities.

Supply chain activities included in the audit scope:

- Semi-Fabrication

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

At the time of the audit (June 2021), access to the site was limited, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and on-site observations for relevant criteria.

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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

14 January 2020 - 13 January 2023

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

13 January 2023

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CERTIFICATE  
NUMBER

21

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>Eurofoil France is certified against ISO 14001 and OHSAS 18001 management system certifications. The site did not receive any significant fines, penalties or warnings from the local authority since September 2017, when they joined ASI.</p> <p>Each departmental area appeared to identify relevant statutes, regulations and international agreements and implemented requirements in their management systems. The site maintains awareness about legal requirements through training and through engagement with industry associations.</p>
1.2 Anti-Corruption	Conformance	<p>Eurofoil France has systems in place to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. This is notably supported by a gift and entertainment policy, commitments in the Code of Conduct and CSR Policy, a documented risk assessment and a gift register. The training component is supported by an online library gathering all of Eurofoil's learning modules, created and managed by the Quality Manager for both Eurofoil Luxembourg and France sites.</p>
1.3 Code of Conduct	Conformance	<p>Eurofoil France recently updated its Social and Environmental Responsibility Policy which also included its Code of Conduct and implemented further alignment with ASI Performance Standard principles. The Policy was being communicated to workers at the time of the audit. E-learning training is being rolled out to workers with modules covering anti-corruption, bribery, conflict of interest and human rights, among others. A direct whistleblowing line is available to on the Eurofoil public website to report any breach.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Eurofoil France evaluated and updated its Environmental and Social Responsibility Policy to align with the environmental, social and governance criteria set out in the ASI Performance Standard.</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrated commitment to sponsor the implementation of ASI and financial and other resources were available. Elements of Eurofoil France's strategy are in line with the ASI Performance Standard principles, including a focus on people, quality and performance.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Environmental and Social Responsibility Policy is available via multiple channels for workers internally and it is also published within Eurofoil France's Annual Environmental Report available on company website, pages 3 - 4: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a> Eurofoil France also implemented a supplier and external providers' code of conduct.
2.2 Leadership	Conformance	The Quality Director (senior manager level) has overall responsibility for ensuring conformance with ASI Performance Standards. A management review of ASI Performance Standard was completed and operational roles and responsibilities for areas of the Standard had been identified.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Eurofoil France has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	Eurofoil France implemented a Social Management System and reviewed its Social and Environmental Responsibility Policy to align with requirements set out in the ASI Performance Standard. The site is certified to OHSAS 18001. The site is subject to regular external audits on health and safety and labour rights measures.
2.4 Responsible Sourcing	Conformance	Eurofoil France implemented a Responsible Sourcing Policy and Strategy covering environmental, social and governance issues aligned with the ASI Performance Standard. The policy takes into account all categories of suppliers, including metal scrap suppliers, and is supported by defined systems, such as supplier self-assessment questionnaire, internal tracking tool for the evaluation of supplier risk and supplier communication, and procurement training on the responsible sourcing policy.

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	No new projects or major changes to existing facilities took place at the Eurofoil France site since the Entity joined ASI in September 2017.
2.6 Emergency Response Plan	Conformance	Eurofoil France has emergency response plans in place. It holds a valid ISO 14001 Environmental Management Systems and OHSAS 18001 Health and Safety Management System certificate which is accepted by ASI as meeting Criterion 2.6.
2.7 Mergers and Acquisitions	Conformance	There is a process in place for mergers and acquisitions which is managed at parent-company level, as confirmed during senior management interviews with Eurofoil Luxembourg.
2.8 Closure, Decommissioning and Divestment	Conformance	Eurofoil France has a process to review environmental, social and governance issues as part of the planning process for closure, decommissioning and divestment. There were no closure, decommissioning and divestment plans at Eurofoil France since the Entity joined ASI in 2017.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Eurofoil France's public Annual Environmental Report discloses information about its material environmental, social and economic impacts, objectives and action plans. The governance approach is clearly outlined, with a list of sustainability commitments about staff training and wellbeing, health and safety, minimisation of environmental impact, and continuous improvement. The report is publicly available from the link below: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a>
3.2 Non-compliance and liabilities	Conformance	No non-compliances, penalties, fines or non-monetary judgements were received by Eurofoil France in the past 12 months.
3.3a Payments to governments (legal and contractual)	Conformance	Eurofoil France is subject to financial audits by PwC (Price Waterhouse Cooper) on an annual basis which ensures it meets ASI Performance Standard's requirements for payments to governments. The site implemented provisions regarding communication of financial results in its Social and Environmental Responsibility Policy.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Eurofoil France has processes in place to manage stakeholder complaints, grievances and requests for information. It holds an ISO 14001:2015 certification which is recognised by ASI as meeting criterion 3.4 Stakeholder complaints, grievances and request for information.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessment was carried out and aligned with ISO 14040:2006 and ISO 14044:2006, covering all product lines for which aluminium is used.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Eurofoil calculates cradle-to-gate lifecycle impact. Environmental Life Cycle Assessments (LCAs) can be provided by Key Account Managers upon request, and are also communicated in Eurofoil France's annual environmental report.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Life Cycle Assessment information is accessible in Eurofoil France's Annual Environmental Report and refers to underlying assumptions including system boundaries, page 11, available at: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a> LCA information can also be provided by Key Account Managers upon request.
4.2 Product design	Conformance	Eurofoil created procedures to integrate lifecycle analysis considerations into product design and development strategy. Pilot projects with customers are aimed at ensuring recyclability of foil products and optimising the manufacturing process as well as thickness of products.
4.3a Aluminium Process Scrap (targets)	Conformance	As per ISO 9001 requirements, Eurofoil France has established objectives and targets to minimise the generation of Aluminium Process Scrap, thus increase the recovery of aluminium and recycle nearly 100% of internal scrap. In addition, recovered dross is used as input in the production process. Eurofoil France has set a recovery target of 72% and there is ongoing monitoring to implement this target.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Eurofoil France implemented an Aluminium Process Scrap recycling plan at every process where scrap can be accrued. Scrap is collected by types of alloys and recycled internally. This aligns with the site's ISO 9001 certification.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	As explained by the site, Eurofoil France does not have the option to reuse any end-of-life aluminium scrap mostly because the restriction on their composition, especially the very low level of magnesium 0.003%.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Eurofoil France is a member of a number of associations working on increasing recycling of post-consumer waste. These included National Recycling Initiatives dedicated to aluminium foil/container/packaging recycling in France (METAL / FAR), UK (Alupro), European Aluminium Foil Association (EAFA).
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Eurofoil France publicly discloses its material GHG emissions and energy use by source on an annual basis, in its publicly available annual environmental report, pages 10 - 11: <a href="http://www.eurofoil.com/documents/EnvironmentalAnnualReportRugles2020.pdf">http://www.eurofoil.com/documents/EnvironmentalAnnualReportRugles2020.pdf</a>
5.2 GHG emissions reductions	Minor Non-Conformance	Eurofoil France have energy targets in place which, if achieved, will deliver GHG emissions reductions, however no time bound GHG reduction targets are stated. The Entity has put in place energy reduction plans, such as LED lighting and the installation of a heat pump system (Ecogreen project), however there is currently no comprehensive plan to achieve an overall GHG emission reduction target as required by the ASI Performance Standard Criterion.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Eurofoil France identifies and reports its emissions to air to the local authority as per the requirements of their permit, and publicly in its annual environmental report, pages 13-16: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a>



CRITERION	RATING	COMMENT
		To minimize the adverse impacts of emissions to air, Eurofoil France has made plans such as the formation of a working group implementing a series of actions to reduce carbon monoxide emissions.
6.2 Discharges to Water	Conformance	Permit levels for discharge to water are followed by the site and robust monitoring processes are in place as per the site's ISO 14001 certification requirement.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	In accordance with its emergency response plan, Eurofoil France implemented robust controls for the assessment of spills and leakage. There is ongoing monitoring of a historic hydrocarbon spill from the 1950s as per permit requirements.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Management and external communication related to spills and leakage were detailed in the site's emergency response plan as per its ISO 14001 certified Environmental Management System.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Eurofoil France operates a crisis communication plan in case of major spills and leakage. There are regular exercises with the company's internal fire brigade related to major spills.
6.4b Reporting of Spills (regular reporting)	Conformance	There were no major spills and leakage since 2017. Eurofoil France operates a crisis communication plan where requirements of immediate disclosure are specified.
6.5a Waste management and reporting (strategy)	Conformance	The waste management strategy is in line with the Waste Mitigation Hierarchy and targets were in place to reduce the generation of some waste streams. Percentages of waste sent to landfill, incineration and recycling were monitored.
6.5b Waste management and reporting (disclosure)	Conformance	Eurofoil France publicly discloses the quantities of hazardous and non-hazardous waste generated, and the associated waste disposal methods (percentage recycled, incinerated for energy production and landfilled), it is annual environmental report, section 4.6, page 17: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	Water withdrawal points were identified and quantities of water inputs are regularly monitored onsite as per regulatory permit.
7.1b Water assessment (risk assessment)	Conformance	Eurofoil France's environmental risk analysis included considerations for aspects and impacts of water withdrawal and water input as required by the ASI Performance Standard Criterion. The site demonstrated compliance with permit levels regarding water withdrawal.
7.2a Water management (management plans)	Conformance	The environmental risk analysis informs the annual target setting for Eurofoil France, in line with ISO 140001 requirements. The water management plan is regularly reviewed in EHS

CRITERION	RATING	COMMENT
		(Environment Health and Safety) committee meetings, and improvements to water use are identified.
7.2b Water management (monitoring)	Conformance	Water inputs and outputs are regularly monitored on the environmental dashboards by the EHS department. There are monthly EHS committee meetings where water consumption and areas for improvement are discussed, in line with the site's ISO 14001 certified Environmental Management System.
7.3 Disclosure of water usage and risks	Conformance	Eurofoil France analyses its risks and does not currently have material water-related risks to report. The Entity reports water withdrawal and use in its annual environmental report, section 4.8, page 19: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Eurofoil France is following the principal national initiative to protect and enhance biodiversity locally called SRCE (Schéma Régional de Cohérence Ecologique, SRCE de Haute-Normandie). The site completed a geographical mapping of their operations and area of influence and concluded that it is not in a Natura 2000, ZICO (Zone d'importance pour la conservation des oiseaux) bird-protection zone, nor a ZNIEFF (Zone naturelle d'intérêt écologique faunistique et floristique) flora and fauna protection zone. However, the site demonstrated good practice by still including the river and forest areas and possible corridors of biodiversity in its biodiversity mapping.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Eurofoil France is not located in a biodiversity protection area. The site has adopted a biodiversity plan following the recommendations of national initiative, SRCE and had periodic consultation with local authorities regarding biodiversity enhancements. The biodiversity plan is also discussed at internal periodic meetings.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Eurofoil France is not located in a biodiversity protection area. The site has adopted a biodiversity plan following the recommendations of national initiative, SRCE and had periodic consultation with local authorities, such as the DREAL, regarding biodiversity enhancements.

CRITERION	RATING	COMMENT
		The biodiversity plan is also discussed at internal periodic meetings.
8.2c Biodiversity management (reporting)	Conformance	<p>Eurofoil France shares its biodiversity outcomes with stakeholders, makes them publicly available in its Annual Environmental Report, and periodically updates them, section 6, page 23: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a></p> <p>Even though the site is not affected by the regional programme for protected zones, the company still contributes to positive biodiversity outcomes by implementing actions such as the preservation of green borders along river banks, avoiding creating new concrete grounds and preserve natural soil function and avoiding the use of pesticides.</p>
8.3 Alien Species	Conformance	Eurofoil France has considered the introduction of alien species via transportation in its environmental risk assessment, and prevents such cases by ensuring that wooden pallets are treated accordingly.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	Eurofoil included a policy commitment to respect Human Rights, as detailed in its Social and Environmental Responsibility Policy. In addition, Eurofoil implemented a Supplier Code of Conduct and human rights training for relevant personnel.
9.1b Human Rights Due Diligence (process)	Conformance	Eurofoil France has an adequate risk assessment process which includes Human Rights Due Diligence that all suppliers are required to respond to and align with. The Entity tracks and scores suppliers’ performance and commitment to

CRITERION	RATING	COMMENT
		the Code of Conduct. Training on human rights has been delivered to relevant staff.
9.1c Human Rights Due Diligence (remediation)	Not Applicable	Since Eurofoil joined ASI, no claims for remediation were received by the site. A whistleblowing form, "Ethic Complaint Form" is directly available on the Eurofoil public website to report any breach. Please see: <a href="http://www.eurofoil.com/about_us/sustainability.html">http://www.eurofoil.com/about_us/sustainability.html</a>
9.2 Women's Rights	Conformance	Eurofoil France complies with French labour law on anti-discrimination and women's rights, as part of general employees' rights, and this is embedded in internal policies. Gender pay gap statistics are regularly reviewed and shared during collective negotiations.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples near the site.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples near the site.
9.5 Cultural and sacred heritage	Not Applicable	There is no site of cultural or sacred heritage near the site.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement has happened at Eurofoil France.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement has taken place at the site.
9.7a Local Communities (rights and interests)	Conformance	Eurofoil France has undertaken a stakeholder mapping exercise, identifying its key stakeholders and their interests. The level of interaction with stakeholders, reporting obligations and the frequency of providing information are regularly monitored by the site.
9.7b Local Communities (impacts)	Conformance	Eurofoil France has undertaken a stakeholder mapping exercise, identifying its key stakeholders and their interests. The level of interaction with stakeholders, reporting obligations and the frequency of providing information are regularly monitored by the site.
9.7c Local Communities (livelihoods)	Conformance	Eurofoil France has mapped its key stakeholders and engages with the local communities and councils in the surroundings of the site.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	Eurofoil France manages local supply chain and suppliers, however global supply chain of metal purchasing is managed at Eurofoil Luxembourg.
9.9 Security practice	Conformance	Several documents describe the human rights applicable in terms of security and safety to the organization: the employee handbook, the Eurofoil security booklet, the collective agreements and the labor code. Discussions with the security guard, HR, workers, and reviews of training logs confirmed implementation.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Eurofoil France maintains dialogue between worker representatives and senior management through Comité Social et Economique (CSE) meetings and trade-union activity. The CSE meetings allow frequent and open discussions between senior management and workers on economic, social and health, safety and labour condition topics, notably through the Questions and Answers section where queries from workers are escalated and answered by management. NAO meetings (annual mandatory trade-union negotiation) are also held annually. A wide range of communication channels are used for sharing those discussions internally with relevant representatives at the site and on the company's intranet.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Eurofoil France implements the set of nationwide "conventions collectives" prescribing the rules for the aluminium industry, based on French law, and there is strong awareness of those amongst the workers.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Freedom of Association is not restricted at Eurofoil France, in compliance with local law. The existence of trade-union related activities at the site was evidenced by the review of policies, minutes and face-to-face meetings with union members and representatives who were part of the workforce.
10.2a Child Labour (minimum age)	Conformance	The French Labour Law is very protective and correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence.

CRITERION	RATING	COMMENT
10.2b Child Labour (hazardous)	Conformance	The French Labour Law is very protective and is correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence reviewed.
10.2c Child Labour (worst forms)	Conformance	The French Labour Law is very protective and is correctly enforced at Eurofoil France on this subject. Reviews of policies, employee files and worker interviews were examples of supporting evidence reviewed.
10.3a Forced Labour (human trafficking)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and implemented at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3b Forced Labour (deposits, fees, advances)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3c Forced Labour (migrant workers)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3d Forced Labour (debt bondage)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and implemented at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3e Forced Labour (freedom of movement)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.3g Forced Labour (freedom to terminate employment)	Conformance	International Labour Organisation conventions 29 and 105 are embedded in policies and followed at Eurofoil France. Evidence was noted in the recruitment procedure, employees' files, relationship with interim worker agency, awareness amongst workers of the Code of Conduct.
10.4 Non-Discrimination	Conformance	Reference documents at Eurofoil France contain reference to the International Labour Organisation conventions 100 and 111 on the prevention of discrimination. This is adequately implemented in the recruitment, promotion, training, provision of health and safety equipment, pay, working time, benefits, and similarity of treatment perceived between different workers such as permanent and interim workers, or male and female employees.
10.5 Communication and engagement	Conformance	There are many committees and channels of communication available for internal engagement at Eurofoil France. In addition, a whistleblowing form, "Ethic Complaint Form" is now directly available on the Eurofoil public website to report any breach.
10.6 Disciplinary practices	Conformance	Disciplinary practice is clearly explained in the employee handbook and other reference documents used at Eurofoil France. The disciplinary practice follows local law, and worker interviews evidenced that the use of sanctions was fair and reasonable.
10.7a Remuneration (living wage)	Conformance	All employees earn at least minimum wage, as listed in the internal salary grid. Wages are regulated through the collective bargaining agreement of the sector, and those rules are clearly implemented at Eurofoil France, as evidenced by payslip reviews and worker interviews. Eurofoil France also provides additional benefits such as meal allowances to workers.



CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	Payslips are received by all employees through the mail, payment is by bank-transfer.
10.8 Working Time	Conformance	Working time is regulated by the law, the collective convention, the rules of procedure, and the employment contract. Eurofoil France has a clocking system to check the hours worked, as well as the resting times. Eurofoil France has various patterns of work including shift work, night work and weekend work, all compensated through pay or recuperation time. The clocking system records presence and absence. The pay software imports the absence as well as the variable elements from the previous month.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.
11.2 OH&S Management System	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.
11.3 Employee engagement on health and safety	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	Eurofoil France operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the requirements in ASI Performance Standard, Criterion 11.

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

Revision	Date	Notes
0	11 April 2019	Issued (Provisional Certification)
1	14 June 2019	Correction to next audit due date
2	14 January 2020	Issued (Full Certification)
3	2 August 2021	Surveillance Audit; Update formatting in Audit Scope section.