
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**EUROFOIL
LUXEMBOURG
SA**

CERTIFICATE
NUMBER

22

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*

CERTIFICATION SCOPE

Eurofoil Luxembourg site in Dudelange
(Luxembourg).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Eurofoil

ENTITY NAME Eurofoil Luxembourg SA

CERTIFICATION SCOPE Eurofoil Luxembourg site in Dudelange (Luxembourg).

SUPPLY CHAIN ACTIVITIES

- Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Certification Audit (4 – 7 February 2019)
- Surveillance Audit (25 November 2019)
- Surveillance Audit (1 and 4 June 2021)

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE

- 4 - 7 February 2019 (Initial Certification Audit)
- 25 November 2019 (Surveillance Audit)
- 1 and 4 June 2021 (Surveillance Audit)

AUDIT REPORT SUBMISSION

- 13 March 2019 (Initial Certification Audit)
- 5 December 2019 (Surveillance Audit)
- 23 June 2021 (Surveillance Audit)

AUDIT SCOPE

Initial Certification Audit (4 – 7 February 2019)
The audit scope covered the Eurofoil Luxembourg site in Dudelange (Luxembourg) 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.

Surveillance Audit (25 November 2019)
The audit scope covered the Eurofoil Luxembourg site in Dudelange (Luxembourg) 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.

Surveillance Audit (1 and 4 June 2019)

The audit scope covered the Eurofoil Luxembourg site in Dudelange (Luxembourg) 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.

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.

CERTIFICATION
PERIOD

14 January 2020 – 13 January 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

13 January 2023

CERTIFICATE
NUMBER

22

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Eurofoil Luxembourg obtained management system certifications for ISO 14001, ISO 9001 and OHSAS 18001 and maintained a robust compliance program to meet ASI Performance Standard criteria. Each departmental area identified 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.
1.2 Anti-Corruption	Conformance	Eurofoil Luxembourg has systems in place to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity's anti-corruption and bribery system is 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.
1.3 Code of Conduct	Conformance	Eurofoil Luxembourg implements a Code of Business Conduct which includes principles relevant to environmental, social and governance performance. The Code is communicated to all categories of suppliers including metal and scrap suppliers, the process has been fully deployed since February 2019. Eurofoil Luxembourg has formal internal procedures for tracking suppliers' responses and suppliers' commitment to the Code. A direct whistleblowing line is available to on the Eurofoil public website to report any breach.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Eurofoil Luxembourg 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.

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'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	Environmental and Social Responsibility Policy was available via multiple channels for internal stakeholders and communicated externally as part of the supplier and external providers code of business conduct. Eurofoil Luxembourg SA's Social and Environmental Responsibility Policy is available on its website: http://www.eurofoil.com/us/about_us/ValuesCommitments.htm
2.2 Leadership	Conformance	A senior management representative has been nominated by the board to have 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 Luxembourg 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 Luxembourg implemented a Social Management System and reviewed its Social and Environmental Responsibility Policy to align with requirements set out in the ASI Performance Standard. Eurofoil Luxembourg had completed a Sedex/SMETA audit and is certified to OHSAS 18001:2007. The site is subject to regular external audits on health and safety and labour rights measures.
2.4 Responsible Sourcing	Conformance	Eurofoil Luxembourg 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

CRITERION	RATING	COMMENT
		communication, and procurement training on the responsible sourcing policy.
2.5 Impact Assessments	Conformance	Eurofoil Luxembourg SA's capital expenditure procedure reflects environmental, social, cultural and human rights impacts assessments criteria of the ASI Performance Standard for new projects and major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	Eurofoil Luxembourg has emergency response plans in place. It holds a valid ISO 14001:2004 Environmental Management Systems certificate and OHSAS 18001:2007 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	There were no closure, decommissioning and divestment plans at Eurofoil Luxembourg since the Entity joined ASI in 2017. Eurofoil Luxembourg has processes in place to consider the environmental, social and governance issues associated with closure, decommissioning or divestment projects.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Eurofoil Luxembourg's public Annual Environmental Report (Titled: "Rapport d'Activités Environnementales Année 2018") discloses information about its material environmental, social and economic impacts, objectives and action plans. The report outlines Eurofoil Luxembourg's governance approach, its sustainability commitments and reference to the alignment with ASI Principles. The report is publicly available from the link below: http://www.eurofoil.com/about_us/sustainability.html
3.2 Non-compliance and liabilities	Conformance	Eurofoil Luxembourg is subject to third-party auditing of its Annual Report and Accounts. Fines, judgments, penalties and non-monetary sanctions are included in scope. Eurofoil Luxembourg has not received any fines, judgments, penalties and non-monetary sanctions in the last 12 months.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	Eurofoil Luxembourg is subject to third-party auditing of its Annual Report and Accounts. Fines, judgments, penalties and non-monetary sanctions are included in scope. Eurofoil Luxembourg has not received any fines, judgments, penalties and non-monetary sanctions in the last 12 months.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Eurofoil Luxembourg has processes in place to manage stakeholder complaints, grievances and requests for information. It holds an ISO 14001:2015 certification.
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	Environmental Life Cycle Assessments were available from Key Account Managers.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Eurofoil Luxembourg SA does not publicly communicate about LCA information, however the results of the LCA feed directly into the Environmental Annual Report Dudelange 2020, page 8, available at: http://www.eurofoil.com/about_us/sustainability.html The LCA is also available upon request from Key Account Managers. Underlying assumptions, including system boundaries were depicted in the lifecycle assessment and communicated to clients upon request.
4.2 Product design	Conformance	Eurofoil Luxembourg has 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. The site also implemented projects to increase the recycling of customers' scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	As per ISO 9001 requirements, Eurofoil Luxembourg has established objectives and targets to minimise the generation of Aluminium Process Scrap, thus increase the recovery of

CRITERION	RATING	COMMENT
		aluminium and recycle nearly 100% of its internal scrap. In addition, recovered dross is used as input in the production process. Eurofoil Luxembourg's recovery rate is approximately 70% and objectives and targets are in place to increase this yield.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Eurofoil Luxembourg 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.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	As explained by the site, Eurofoil Luxembourg 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%. However, Eurofoil Luxembourg is working with customers on pilot projects to increase the extraction of aluminium from this pre-consumer scrap which can then be re-used in Eurofoil's foundries.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Eurofoil Luxembourg is in the process of implementing waste management and recycling actions based on local scheme SuperDrecksKëscht, and 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 Luxembourg publicly discloses its material GHG emissions and energy use by source on an annual basis, in its publicly available Annual Environmental Report, page 5 - 7: http://www.eurofoil.com/documents/EnvironmentAnnualReportDudelange2020.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	Eurofoil Luxembourg have energy targets in place which, if achieved, will deliver GHG emissions reductions, however no time bound GHG reduction targets are stated. More information about Eurofoil Luxembourg's energy reduction plans and performance can be found in the Annual Environmental Report, pages 5 - 6: http://www.eurofoil.com/documents/EnvironmentAnnualReportDudelange2020.pdf

CRITERION	RATING	COMMENT
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 Luxembourg regularly monitors its emissions to air, maintains an inventory and developed action plans to reduce these. The site performed in compliance with local regulatory requirements related to air emissions. The site holds a valid ISO 14001 Environmental Management System certificate. The site reports emissions to air to the local authority on a regular basis. There is no public reporting of emissions to air via its website or annual reports.
6.2 Discharges to Water	Conformance	Discharges to water were covered by the site's ISO 14001 Environmental Management System certification and meets its permitting requirements. Eurofoil Luxembourg maintains an inventory, monitoring, plan to mitigate impacts as a result of discharges to water as per current system.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Assessment and management of Spills and Leakage is documented by Eurofoil Luxembourg's ISO 14001 certified Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Management and external communication plans related to spills and leakage are detailed in Eurofoil Luxembourg's emergency response plan (Plan D'Urgence). No major spills and leakage occurred on site that would trigger the external communication requirements. This aspect is covered by the site's ISO 14001 certified Environmental Management System.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place for disclosure to affected parties of the volume, type and potential impact of significant Spills immediately after an incident.
6.4b Reporting of Spills (regular reporting)	Conformance	Eurofoil Luxembourg does not have any spill to report this year, but if there were any, their impact assessments and remediation actions would be

CRITERION	RATING	COMMENT
		reported internally to the DREAL (local authority) and externally in Eurofoil Luxembourg's 2020 Environmental Report, section 2, page 5: http://www.eurofoil.com/about_us/sustainability.html
6.5a Waste management and reporting (strategy)	Conformance	Eurofoil Luxembourg has a formal procedure to implement a waste management strategy aligned with the Waste Mitigation Hierarchy. The site set a waste reduction action plan within a 2020-2025 timeframe. Eurofoil Luxembourg maintains a robust inventory of hazardous and non-hazardous waste, demonstrating legal compliance with local Applicable Law. Eurofoil Luxembourg also plans in 2021 to get certified by Luxembourgish organisation SuperDrecksKëscht (SDK) which helps companies implement the government's recycling recommendations.
6.5b Waste management and reporting (disclosure)	Conformance	Eurofoil Luxembourg publicly discloses waste information on an annual basis in its environmental report. Public reporting is very detailed with graphs showing breakdown of quantities for 30 categories of waste, percentage of hazardous and non-hazardous waste and 8 types of waste-disposal methods. Please see section 6, page 10: http://www.eurofoil.com/about_us/sustainability.html
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.
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.

CRITERION	RATING	COMMENT
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	Eurofoil Luxembourg monitors its water balance. Water consumption and withdrawal are monitored as are emissions as cooling vapor and discharges. The site has set a water reduction target, and monitors an action plan to prevent leaks and to reduce water consumption.
7.1b Water assessment (risk assessment)	Conformance	Water use is limited to metered water via the fresh water system. All regulatory requirements relating to water are met and the key risks relating to use and discharges are managed and met. The site and community would benefit from supporting a catchment related water risk assessment.
7.2a Water management (management plans)	Conformance	The site has set a water reduction target, and monitors an action plan to prevent leaks and to reduce water consumption. The water management plan is regularly reviewed by the environmental department.
7.2b Water management (monitoring)	Conformance	Water inputs and outputs are regularly monitored on the environmental dashboards by the environmental team and consumption of water is covered in management reviews.
7.3 Disclosure of water usage and risks	Conformance	Eurofoil Luxembourg analysed its water-related risks and does not currently have material water-related risks to report. The Entity reports water withdrawal and use in its annual environmental

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		<p>report, as well as a reduction target and measures in place to reach this. Please see Eurofoil Luxembourg's Environmental Report for further detail, section 5.1, page 9: http://www.eurofoil.com/about_us/sustainability.html</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Eurofoil Luxembourg assessed the risks and materiality of the impacts on biodiversity from the land use and activities in its area of influence. An independent biodiversity risk assessment and impact assessment has been undertaken by local independent expert. Relevant stakeholders and experts were considered as part of the biodiversity impact assessment.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>Eurofoil Luxembourg has commissioned a biodiversity study which resulted in an action plan to address material impacts and monitor effectiveness. It must be noted that although the biodiversity impact assessment concluded that Eurofoil Luxembourg's activities did not have material impacts in its area of influence, to demonstrate best practice the Entity has taken into account the recommended action plan and has started implementing it. Biodiversity commitments and plans are also publicly disclosed in the Entity's Environmental Report, section 7, page 11: http://www.eurofoil.com/about_us/sustainability.html</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>Eurofoil Luxembourg's biodiversity action plan is designed in accordance with the mitigation hierarchy, and local experts were consulted in the assessment process. It must be noted that although the impact assessment concluded that Eurofoil Luxembourg's activities did not have material biodiversity impacts, to demonstrate best practice the Entity has taken into account the recommended action plan to further enhance biodiversity. Eurofoil Luxembourg's biodiversity commitments and plans are also publicly disclosed in the Entity's Environmental Report, page 11: http://www.eurofoil.com/about_us/sustainability.html</p>

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8.2c Biodiversity management (reporting)	Conformance	Eurofoil Luxembourg's discloses in its public Environmental Report its biodiversity commitments and plans, describes the integration of biodiversity actions into Eurofoil's broader sustainability framework, and its engagement with its partners and suppliers to participate in this effort. For further information, please see page 11 of Eurofoil Luxembourg's Annual Environmental Report: http://www.eurofoil.com/about_us/sustainability.html
8.3 Alien Species	Conformance	Eurofoil Luxembourg has carried out a biodiversity study taking into account alien species. The Entity has put measures in place by updating the code of business conduct and its communication with suppliers to proactively prevent accidental or deliberate introduction of alien species that could have significant adverse impacts on biodiversity.
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.
9.1b Human Rights Due Diligence (process)	Conformance	Eurofoil Luxembourg has an adequate supplier risk assessment process which includes human rights due diligence. The Entity regularly evaluates suppliers' responses and commitment to the Supplier Code of Conduct. Eurofoil Luxembourg's Collective Bargaining Agreement also references human rights. Training on human rights has been delivered to relevant staff.
9.1c Human Rights Due Diligence (remediation)	Conformance	Since Eurofoil joined ASI, no claims for remediation were received by the site. A

CRITERION	RATING	COMMENT
		whistleblowing form, "Ethic Complaint Form" is directly available on the Eurofoil public website to report any breach: http://www.eurofoil.com/about_us/sustainability.html
9.2 Women's Rights	Conformance	Eurofoil Luxembourg complies with local law on aspects such as equal pay and equal opportunities. Low levels of gender diversity were observed on the factory floor, however women are represented at senior management level.
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 area of cultural and sacred heritage near the site.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement has happened at Eurofoil Luxembourg.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement has happened at Eurofoil Luxembourg.
9.7a Local Communities (rights and interests)	Conformance	Eurofoil Luxembourg demonstrated an understanding of community interests. The site identified a range of stakeholders, their issues of importance and prioritised frequency of communication to them. The site implemented documented procedures to respond to grievances or requests for information.
9.7b Local Communities (impacts)	Conformance	The site implemented documented procedures to respond to grievances or requests for information.
9.7c Local Communities (livelihoods)	Conformance	Eurofoil Luxembourg has built a robust understanding of its key stakeholders and methods to engage with them. The site implemented procedures to respond to grievances and requests for information.
9.8 Conflict-Affected and High-Risk Areas	Conformance	Eurofoil Luxembourg ensures it does not contribute to armed conflict or human right abuses in conflict-affected or high-risk areas; this is reflected in its Responsible Sourcing Policy and supplier due diligence process.
9.9 Security practice	Conformance	Eurofoil Luxembourg implemented a documented process to demonstrate human rights compliance in terms of security practices: the employee

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		handbook, the Eurofoil security booklet, the collective agreements, the labor code, training records.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Multiple testimonies and documents showed there is an effective dialogue between senior management and operators. The "Delegation" (internal worker representatives committee) has a very strong presence in the company; it is composed of a mix of operators and office workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Multiple testimonies and documents showed there is an effective dialogue between senior management and operators. The Entity appears to effectively implement the collective bargaining agreement in place for the aluminium sector.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	In Luxembourg, the local law does not restrict the right to freedom of association and collective bargaining and this is reflected at the site, with a very active worker representative committee and union presence.
10.2a Child Labour (minimum age)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention Collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure requiring proof of age and right-to-work documents.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention Collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure requiring a photocopy of IDs in personnel files.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Luxembourg and laws are adequately enforced. Prevention of child labour is embedded in relevant company documents such as the Convention Collective. Apprentices are subject to special protective measures. Eurofoil Luxembourg SA has an effective on-boarding procedure.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the Ethics Complaint Form.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3c Forced Labour (migrant workers)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3d Forced Labour (debt bondage)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3e Forced Labour (freedom of movement)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the hotline.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Eurofoil Luxembourg has an adequate hiring procedure and workers' rights to work is reviewed prior to commencing work as per Luxembourgish law. The Convention Collective adequately details the rights and duties of employer and employees on hiring and termination of contract. Workers have free and open access to their supervisors, HR, the committee representatives and the Ethic Complaint Form.
10.4 Non-Discrimination	Conformance	Eurofoil Luxembourg explicitly prohibits discrimination in its Social and Environmental Responsibility Policy, the employee handbook and the Convention collective. Recruitment, promotion, pay, working time, trade-union membership is in line with this policy. Multiple channels of communication are in place to report any grievances.
10.5 Communication and engagement	Conformance	Frequent internal dialogues were in place involving all levels from operators to senior management. Furthermore, there are regular joint committee and health and safety committee meetings where issues and concerns can be discussed, involving workers, trade union representatives and senior management. 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	Eurofoil Luxembourg respects its employees and disciplinary practices are explained in the employee handbook and other documents of reference, and follow the local law, and in some cases are more favourable than local laws (e.g. number of warnings issued before a higher sanction). Worker representatives are also involved with disciplinary investigation processes.
10.7a Remuneration (living wage)	Conformance	Internal documents of reference such as Convention Collective detailed salary levels,

CRITERION	RATING	COMMENT
		deductions and taxes, overtime pay, weekend pay, bonuses. These aspects are negotiated with the trade union on a periodic basis. The Convention Collective are adequately implemented in the workplace.
10.7b Remuneration (method of payment)	Conformance	All employees are paid through bank transfer every month. A copy of the payslip is also sent through the post, and a separate one for bonuses. This was confirmed by worker interviews.
10.8 Working Time	Conformance	Internal documents of reference such as the convention collective detail working time, overtime work, weekend work, holidays which are adequately implemented in HR practices.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Eurofoil Luxembourg 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 Luxembourg 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 Luxembourg 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 Luxembourg 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 Luxembourg 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 Luxembourg operates an integrated management system which is certified to OHSAS 18001, accepted by ASI as meeting the

CRITERION	RATING	COMMENT
		requirements in ASI Performance Standard, Criterion 11.
11.4 OH&S performance	Conformance	Eurofoil Luxembourg 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.