

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Gränges Konin SA

CERTIFICATE NUMBER

315

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED AUDITOR

TÜV RHEINLAND
CERT GMBH

DATE OF ISSUE

11 OCTOBER 2023

DATE OF EXPIRY

10 OCTOBER 2026

CERTIFIED SINCE

11 OCTOBER 2023

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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

The design and manufacture of rolled aluminium strips and sheets at the Gränges facility located in Konin, Poland.

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Gränges Konin SA
CERTIFICATION SCOPE	The design and manufacture of rolled aluminium strips and sheets at the Gränges facility located in Konin, Poland.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">23 – 24 February 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 August 2023
AUDIT SCOPE	<p>The audit scope included the design and manufacture of rolled aluminium strips and sheets at the Gränges facility located in Konin, Poland.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>All relevant criteria in the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	11 October 2023 – 10 October 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	11 October 2025
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CERTIFICATE NUMBER	315
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Konin facility has been in operation for over 50 years with production commencing in 1966 with both primary smelting and rolling operations as a state owned enterprise. The Entity, which currently employs over 700 personnel, was privatized in 1995 and in 2008 it was merged with Impexmetal. The primary smelter was closed in 2009 due to high energy prices but the aluminium rolling mill continued operations. In 2020 the rolling mill and remelting facility was acquired by Gränges AB. In 2021 and 2022 additional investments have been conducted in the factory by adding additional casting capacity, an additional cold rolling mill as well as annealing furnaces and also a new thick gauge slitter. Capacity has been increased from 100 000 tonnes to 140 000 tonnes by these investments. The majority of Gränges Konin S.A.'s products are used in the automotive, packaging, electrical engineering, and construction industries.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	OVERALL
SYSTEMS	High
RISKS	Low
PERFORMANCE	High
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity is an ASI Member. Certification for Performance Standard is ongoing. https://aluminium-stewardship.org/about-asi/asi-members/granges
1.2 CoC Management System	Conformance	The Entity has created a common procedure for the Chain of Custody (CoC) Management System for all sites that covers all relevant requirements. Overall, the Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard.
1.3 CoC Management System Monitoring	Conformance	The design of the Management System provides for an annual periodic review. Due to a lack of actual CoC Material flow, a formal review was limited to the CoC system design and not the system's performance. Annual internal audits of the Management System are in place.
1.4 Management Representative	Conformance	The Entity has nominated an Integrated Management System Representative to have overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has prepared and conducted a Chain of Custody specific training for relevant personnel and has communicated CoC related information to all employees.
1.6 Records Management	Conformance	The Entity has established systems to maintain up to date records covering all applicable requirements of the ASI Chain of Custody Standard. These will be retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7d Reporting to ASI (Positive Balance carried over)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7e Reporting to ASI (Positive Balance used)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.

CRITERION	RATING	COMMENT
1.7f Reporting to ASI (Internal Overdraw drawn down)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
1.7g Reporting to ASI (Intra-Entity Flows)	Not Applicable	This Criterion is not applicable for the Entity's first Certification Audit, as the Entity currently has no CoC Material flow to report.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity as they do use Outsourcing Contractors for CoC Material.
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP

4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity has established procedures and processes to verify Pre-Consumer Scrap as designated CoC Material. Internally Generated Scrap will be re-fed into the production. Dross is sold for external recycling.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity has established procedures and processes to verify the nature of the supplied scrap (pre- or post-consumer).
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity has a documented process in place to gather and verify information about its scrap suppliers, including their identity, principles and place(s) of operation of the suppliers.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity has established procedures and processes to verify the nature of the supplied scrap (pre- or post-consumer). Pre/Post-Consumer Scrap is only accounted for as Eligible Scrap if the Due Diligence assessment confirmed an acceptable risk level and the material is 'pre/post-consumer'.
4.2c Eligible Scrap (Dross)	Not Applicable	The Entity does not remelt Aluminium recovered from Dross and other Aluminium containing wastes.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has a documented process in place to gather and verify information about its scrap suppliers, including their identity, principles and place(s) of operation of the suppliers.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	According to the management statement included in the Entity's Code of Conduct, the Entity does not purchase any aluminium (scrap or primary) in cash. All transactions are undertaken via bank transfer.

5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a ASI Aluminium (CoC Certification Scope)	Conformance	Control procedures and systems have been established to ensure that Primary Aluminium is only sourced from ASI Certified Entities. Recycled Aluminium is sourced from external sources under Non-CoC Material flow.
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CRITERION	RATING	COMMENT
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity sources CoC Aluminium from qualified CoC suppliers who are either certified according to the scope of the ASI CoC or are certified by the ASI Performance Standard.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	ASI Aluminium is produced only from Casthouses that are directly from another ASI CoC Certified Entity, or via a Trader, where the ASI CoC Certified Entity that is the source of the ASI Aluminium can be identified and can provide a verified CoC Document.
5.2 Unique Identification	Conformance	The Entity's Material Accounting System demonstrates that systems are in place to ensure that unique identification numbers, with physical ID stamped on ASI Aluminium slabs, can be linked to the Input Quantity of CoC Material for the specific Material Accounting Period.

6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	Control procedures and systems have been established to ensure that Primary Aluminium only is sourced from ASI Certified Entities. The Entity itself produces ASI Aluminium only from material sourced from a CoC Certified Entity.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity has established systems to ensure that it is producing ASI Aluminium only from an Entity/Facility already certified against the ASI Performance Standard and ASI Chain of Custody Standard. Material sourced from Entities not certified according to the ASI Standards is regarded as Non-CoC Material.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity has established systems to ensure that it is producing ASI Aluminium only from an Entity/Facility that sources ASI Aluminium directly from another ASI Chain of Custody Certified Entity, or via a metals Trader or warehouse where the ASI Chain of Custody Certified Entity can supply or verify the associated CoC Document containing required Information.

7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has established processes and implemented a Policy to prevent Corruption in the business operations. There is a process in place to train relevant persons about the Entity's values and whistleblowing procedures.
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has developed and implemented a Supplier Code of Conduct which establishes a framework for compliance in the scope of Human Rights and working conditions including but not limited to Forced Labour, Freedom of Association, working hours, wages etc. The Code is based on the UN Guiding Principles and ILO fundamental conventions.
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	<p>The Entity has established processes to assess risks for Human Rights in the supply chain. Details are available on the company webpage at: https://www.granges.com/sustainability/responsible-and-sustainable-sourcing/</p> <p>This process is managed by a responsible person in the parent Entity. Through legal obligations communicated in an annex to supplier</p>

CRITERION	RATING	COMMENT
		contracts, suppliers are made aware of the Entity's expectations regarding Human Rights.
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	The Entity has implemented a risk assessment process to assess potential risks for Human Rights in conflict areas. The Entity has identified there is no evidence of supporting armed conflict in the neighbouring state (Ukraine) was found.
7.2 Risk Assessment and Mitigation	Conformance	The parent Entity manages the risk assessment process regarding Human Rights in the supply chain. The process is well structured, with input from individual entities. By assessing the entire supply chain, the Entity can actively assess potential risks. Through management interviews it was clear that the training and awareness provided were effective as they were able to explain the significance of this process.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has established processes for Stakeholders, including suppliers, to report grievances.
8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity's Management System includes a Material Accounting System that records the Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based on the Entity's enterprise resource planning system.
8.2 Material Accounting Period	Conformance	The Entity has specified in writing, that the Material Accounting Period in the Entity's Material Accounting System is 12 months.
8.3 Input and Inflow Quantities	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula taking into account quantities of CoC Material and Non CoC Material. Units in the numerator and the denominator are the same. The Entity performed a test for recent months during the audit and all formulas were correct.
8.4 Output Quantities of CoC Material	Conformance	The Entity uses the Input Percentage for the 12-month Material Accounting Period to determine the Output Quantity of CoC Material, by mass.
8.5 Indivisibility of CoC Material	Conformance	As written in the Entity's CoC procedure, the Entity has established that the Output Quantity of COC Material is designated as 100% CoC Material. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.6 Output Quantity of Eligible Scrap	Conformance	For Pre-Consumer Scrap produced by the Entity, the Input Percentage of the Material Accounting Period will be used to determine the Output Quantity of Eligible Scrap.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity has implemented a procedure to check that the total Output of CoC Material does not proportionally exceed the Input Percentage as applied to the total Input of CoC Material over the Material Accounting Period.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by any Force Majeure situation.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is identified.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of Output CoC Material at the end of the Material Accounting Period will be carried over to the subsequent period and that such carry over will expire at the end of that period if not drawn down.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of the Entity's ASI Chain of Custody related procedures. Documents and interviews with personnel. The Entity will include CoC information in a separate accompanying document.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the date of issue.
9.2b CoC Document Content (Reference number)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a reference number.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification number of the issuer.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification number of the receiving Entity.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC

CRITERION	RATING	COMMENT
		Certified Entities. The design of the CoC Documents includes the name of the responsible employee.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a statement confirming that "The information provided in the CoC Document is in conformance with the ASI Chain of Custody Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the type of CoC Material in the shipment.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the mass of total Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity includes Supplementary Information in its CoC Documents as optional information as per customer request.
9.3b Sustainability Data (optional) - Origin information	Conformance	The Entity includes Supplementary Information in its CoC Documents as optional information as per customer request.
9.3c Sustainability Data (optional) - Recycled content	Conformance	The Entity includes Supplementary Information in its CoC Documents as optional information as per customer request.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Conformance	The Entity has decided to provide information about its ASI Certification Status for the ASI Performance Standard on its CoC Documents as optional information per customer request.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity includes Supplementary Information in its CoC Documents as optional information.
9.5 Verification of Information	Conformance	The Entity has prepared a provision relating to responding to requests related to CoC Documents contained in the ASI management procedure.
9.6 Error (Shipping)	Conformance	The Entity has defined in its ASI management procedure the way in which errors regarding CoC shipments must be handled such as the documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence.

CRITERION	RATING	COMMENT
10. RECEIVING CoC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has defined in the ASI Management procedure how to verify the received CoC Documents and a specific checklist has been created to perform it. The use of this checklist has been performed and results are satisfactory. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has defined in the ASI Management procedure how to verify the received CoC documents and a specific checklist has been created to perform it. All deliveries are verified when entering the facilities prior to being entered into the internal IFS system. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has defined in the ASI Management procedure how to verify the supplier CoC Certification Status. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.4 Error (Reception)	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents as required by the ASI Chain of Custody Standard. Relevant employees have been trained accordingly.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. As there have been no claims regarding CoC at the time of the first Certification Audit, the effectiveness of the procedure will be assessed at the next Surveillance Audit.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has developed procedures and processes to ensure that claims about CoC Material outside of CoC Documents are made in a form consistent with the ASI Claims Guide. The Entity has established procedures to ensure that it keeps verifiable evidence to support the claims and/or representations made.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has developed plans for training employees on the provisions of the ASI Chain of Custody Standard. The Entity provided documented evidence that relevant personnel have received training on CoC claims.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 October 2023	Certification Audit - Full Certification
