

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Constantia Alucap

CERTIFICATE NUMBER

536

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

20 MARCH 2026

DATE OF EXPIRY

19 MARCH 2029

CERTIFIED SINCE

20 MARCH 2026

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at
www.aluminium-stewardship.org

CERTIFICATION SCOPE

Manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l., located in Borgo Valsugana (Trento), Italy.

AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Constantia Flexibles International GmbH
ENTITY NAME	Constantia Alucap
CERTIFICATION SCOPE	Manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l, located in Borgo Valsugana (Trento), Italy.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-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	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 27 – 29 August 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 19 January 2026
AUDIT SCOPE	<p>The Audit Scope includes the manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l, located in Borgo Valsugana (Trento), Italy.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant Criteria from 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.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 20 March 2026 – 19 March 2029

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 19 March 2029

CERTIFICATE NUMBER 536



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

Constantia Alucap (the 'Entity') is part of the Constantia Flexibles International GmbH Group and specialises in the production of printed die-cut lids and reels made of Aluminium and plastic film. The application of 'state-of-the-art' technology allows the Entity to achieve the highest standard in term of quality and performance, required for foodstuff packaging. The Entity is located in Borgo Valsugana, near Trento, Italy and is close to Central European markets as well as areas with the most significant yoghurt and dairy production throughout Italy. The Entity is surrounded predominantly by agricultural lands with the nearest residents located within 100 metres of the Entity.

The Entity is one of the biggest employers in the area as the number of employees has grown significantly in the last five years, currently employing approximately 80 Workers, an increase of nearly 30 since 2020. The Entity currently manufactures approximately 2.2 billion lids per annum and has an annual turnover of approximately 20 million Euro.

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	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	Constantia is founding member of ASI and was one of the first companies and the first European company to be certified against the ASI Performance Standard. Constantia Alucap SRL (the 'Entity') is owned and controlled at 100% by Constantia Flexibles International GmbH.
1.2 CoC Management System	Conformance	The Entity has implemented an integrated Management System in accordance with ISO 9001 and other external certifications. The requirements of ASI are addressed by the existing systems and additional Policies. Internal and external audits are conducted to monitor conformance with the requirements of the ASI Chain of Custody (CoC) Standard.
1.3 CoC Management System Monitoring	Conformance	The Entity's Management System facilitates regular approval and review of systems and documentation.
1.4 Management Representative	Conformance	The Entity's Quality Manager has been appointed to implement the CoC Management System, as documented in procedures and the Entity's organisational chart.
1.5 Communications and Training	Conformance	Regular communications are sent from the Quality Manager to all involved persons with relevant procedures and training is provided to process operators.
1.6 Records Management	Conformance	The requirements of the ASI Chain of Custody (CoC) Standard are addressed by the Entity's general instructions on document retention time. All documents must be securely retained for at least five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has defined internal procedures to fulfil the annual reporting requirements to the ASI Secretariat. The Entity undertakes timely submission of the annual report to the ASI Secretariat and includes Input and Output Quantities of CoC Material/s within the calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity, as it does not utilise Scrap in its processes.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has defined internal procedures to fulfill the annual reporting requirements to the ASI Secretariat. The Entity demonstrates conformance, which includes the timely submission of the annual report to the ASI Secretariat and includes information on total Inflows and Outflows of Non-CoC Material within the calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has defined internal procedures to fulfil the annual reporting requirements to the ASI Secretariat. The Entity undertakes timely submission of the annual report to the ASI Secretariat and includes information on maximum Positive Balance within the calendar year carried over to the subsequent Material Accounting Period.

CRITERION	RATING	COMMENT
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has defined internal procedures to fulfill the annual reporting requirements to the ASI Secretariat. The Entity undertakes the timely submission of the annual report to the ASI Secretariat, including information on the Positive Balance used within the calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has defined internal procedures to fulfill the annual reporting requirements to the ASI Secretariat. The Entity undertakes timely submission of the annual report to the ASI Secretariat and includes information on the maximum Internal Overdraw within the calendar year and the percentage of CoC Material Input Quantity this represents.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has defined internal procedures to fulfill the annual reporting requirements to the ASI Secretariat. The Entity undertakes timely submission of the annual report to the ASI Secretariat and includes Entity Intra-Entity Flows within the calendar year.

2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.
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 it does not have Outsourcing Contractors included within the Certification Scope.
2.5 Error (Outsourcing Contractor)	Not Applicable	This Criterion is not applicable to the Entity, as it does not have Outsourcing Contractors included within the Certification Scope.

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.

CRITERION	RATING	COMMENT
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.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Material Accounting System is designed to ensure that it only produces ASI Aluminium from Facilities which are within its own ASI CoC Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Conformance	The Entity's Post-Casthouse activities and processes are undertaken at sites certified against the ASI Performance Standard. Refer to: https://aluminium-stewardship.org/about-asi/members/Constantia-Flexibles-International-GmbH
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's Material Accounting System identifies ASI Aluminium and ASI-containing material with a special material code. ASI material can be identified and tracked from the supplier throughout the Entity through to dispatch.

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 communicates its commitment regarding anti-Corruption, and fair business practices in its Code of Conduct that must be accepted by all suppliers and subcontractors. The Code is available at: https://www.cflex.com/quality/code-of-conduct
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity communicates its commitment to responsible sourcing in its Code of Conduct, which must be accepted by all suppliers and subcontractors. It requests from its suppliers, to communicate any problem they may identify. The Entity has also published a Human Slavery and Trafficking Statement. Refer to: https://www.cflex.com/quality/code-of-conduct
7.1c Responsible Sourcing Policy (Human Rights Due Diligence)	Conformance	The Entity communicates its commitment regarding Human Rights, and fair business practices in its Code of Conduct, which must be accepted by all suppliers and subcontractors. The Code is available at: https://www.cflex.com/quality/code-of-conduct
7.1d Responsible Sourcing Policy (Conflict-Affected and High-Risk Areas)	Conformance	The Entity communicates its commitment to responsible sourcing in relation to Conflict-Affected and High-Risk Areas (CAHRAs) in its Code of Conduct: https://www.cflex.com/quality/code-of-conduct
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a supplier risk assessment and qualification process for all new suppliers.
7.3 Complaints Resolution Mechanism	Conformance	The Entity communicates its 'whistleblowing' hotline both in the Code of Conduct and in the Code of Conduct for suppliers. Both Codes are

CRITERION	RATING	COMMENT
		available at: https://constantiaflexibles.gan-compliance.com/p/Speakup
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 Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system.
8.2 Material Accounting Period	Conformance	The Entity's accounting period is fixed as one year and reported in the ASI management review. If necessary, the material balance can also be calculated for any other period.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a specific system for the identification and marking of ASI material. It is not only possible to identify all Input and Output Material along the material flow, but also to ensure, that the Material has not been mixed.
8.4 Output Quantities of CoC Material	Conformance	The Entity has established a specific system for the identification and marking of ASI material. It is not only possible to identify all Input and Output Material along the material flow, but also to ensure, that the Material has not been mixed.
8.5 Indivisibility of CoC Material	Conformance	The Entity only uses ASI certified material for the ASI orders of its clients. Therefore, the Entity can classify all ASI Output as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity's Process Scrap is pressed and sold to an authorised Scrap dealer. Currently however, the Entity is not producing Eligible Scrap.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity uses ASI certified material for the ASI orders of its clients and collects the Scrap of ASI production accordingly. There is no material risk present that the Output of ASI certified products and ASI Scrap exceeds the Input of ASI certified material.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has specified in a procedure that in the case of a Force Majeure situation, its Material Accounting System can carry over an Internal Overdraw of up to 20% of total Input Quantity of CoC Material to the subsequent accounting period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity has specified in a procedure that in the case of a Force Majeure situation, its Material Accounting System can carry over an Internal Overdraw to the subsequent accounting period. The amount of overdraw must not exceed the amount of Material that was part of the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity has specified in a procedure that in the case of a Force Majeure situation, its Material Accounting System can carry over an Internal Overdraw to the subsequent accounting period, and that the amount of material must be made up within the subsequent Material Accounting Period.

CRITERION	RATING	COMMENT
8.9a Positive Balance (Carry over)	Conformance	The Entity has specified in a procedure that any ASI certified material that cannot be used in the current year, may be transferred to the next accounting period. It must be marked as carry-over material and be used in this period.
8.9b Positive Balance (Expiry)	Conformance	The Entity has specified in a procedure that any ASI certified material that cannot be used in the current year, may be transferred to the next accounting period. It must be marked as carry-over material and be used in this period.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	ASI CoC requirements are implemented in the Entity's ERP System. If material is marked as ASI material, all relevant information is printed on the according documents (including delivery documents, invoices, and pallet labels).
9.2a CoC Document Content (Date of issue)	Conformance	All CoC Documents carry the date, which is the date of the delivery note.
9.2b CoC Document Content (Reference number)	Conformance	All CoC Documents carry reference numbers. The reference number is the batch number (or the order number) of the product that was ordered. This enables the verification of ASI certified material.
9.2c CoC Document Content (Issuing Entity)	Conformance	All relevant CoC Documents carry the Entity name, address and CoC number for each shipment.
9.2d CoC Document Content (Receiving customer)	Conformance	All relevant CoC Documents carry the Entity name, address and the CoC number of the customer receiving the Entity's CoC Material (if the customer is another CoC certified Entity).
9.2e CoC Document Content (Responsible employee)	Conformance	All documents for the client carry the name of the Account Manager (Kundenbetreuer), who is responsible for the handling of the order. They are the first point of contact for all questions and forward these on to the Product Manager and/or the Quality Department.
9.2f CoC Document Content (Conformance statement)	Conformance	ASI documents carry the claim 'The information provided in the CoC document is in accordance with the ASI CoC Standard'.
9.2g CoC Document Content (Type of CoC Material)	Conformance	All CoC Documents will specify the Material as 'ASI Aluminium'.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	All shipping documents for ASI certified material carry the information on the amount of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	All shipping documents for ASI certified material provide information about the Mass of CoC Material and the mass of total material in the shipment.

CRITERION	RATING	COMMENT
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to disclose Supplementary Information on CoC documentation.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to disclose Supplementary Information on CoC documentation.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to disclose Supplementary Information on CoC documentation.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to disclose Supplementary Information on CoC documentation.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable to the Entity, as it does not intend to disclose Supplementary Information on CoC documentation.
9.5 Verification of Information	Conformance	The Entity's Quality Department is responsible for responding to questions from customers on the mass balance, with support from the Product Management and Sales Departments. All necessary records of delivery documents, and batch records are available to verify amounts.
9.6 Error (Shipping)	Conformance	The Entity has implemented a Management System to record, analyse and document all errors, identified and claimed by the customer. All errors identified in the mass balance have to be reported in the management review.
10. RECEIVING COC DOCUMENTS		
10.1 Verification of CoC Documents	Conformance	The Entity has established a system where ASI certified material is ordered as special material with a unique material code. During delivery, the amount of material and the material code are checked before booking the material into the ERP System.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	Upon delivery, the consistency of received material with accompanying documents is reviewed. This is also undertaken with all ASI material before recording the information in the Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established a system to assess on an annual basis relevant quality and environment data of its suppliers unique-including certificates, their validity and any change in the ASI Certification Scope.
10.4 Error (Reception)	Conformance	The Entity reviews all deliveries upon arrival. If errors, damages or inconsistencies are identified, an internal complaint is opened in the ERP System and managed accordingly. The Quality Department is responsible for any follow-up, including root-cause analysis and agreed measures with the department heads and the suppliers

CRITERION	RATING	COMMENT
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has defined the work instructions for labelling CoC certified Material (ASI CoC Claim) as defined in a controlled document.
11.1b Claims and Communications (Verifiable evidence)	Conformance	An internal Procedure has been developed for claims referring to ASI Claims Guide.
11.1c Claims and Communications (Employee training)	Conformance	All relevant employees have received training on claims and related communications that is consistent with the requirements of the ASI Claims Guide.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 March 2026	Initial Certification Audit – Full Certification