ASI CERTIFICATION
CHAIN OF CUSTODY STANDARD

PRESENTED TO

EUROFOIL LUXEMBOURG

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITOR
81	CHAIN OF CUSTODY (V1 2017)	FULL CERTIFICATION	DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
26 MAY 2023	31 MAY 2028	26 MAY 2020

AUTHORISED BY

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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
CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Jiangsu Zhongji Lamination Materials Co., Ltd
ENTITY NAME	Eurofoil Luxembourg
CERTIFICATION SCOPE	Eurofoil Luxembourg site in Dudelange (Luxembourg).
SUPPLY CHAIN ACTIVITIES	• Casthouses • Post-Casthouse
ASI STANDARD	• Chain of Custody Standard V1
AUDIT TYPE	• Initial Certification Audit (17 – 18 March 2020) • Surveillance Audit (19 May 2022) • Re-Certification Audit (3 – 26 May 2023) • Surveillance Audit and Scope Change (29 – 30 July 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 17 – 18 March 2020 (Initial Certification Audit) • 19 May 2022 (Surveillance Audit) • 3 – 26 May 2023 (Re-Certification Audit) • 29 – 30 July 2025 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	• 15 May 2020 (Initial Certification Audit) • 20 June 2022 (Surveillance Audit) • 21 June 2023 (Re-Certification Audit) • 11 October 2025 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (17 – 18 March 2020)</u> The Audit Scope related to the Chain of Custody process and documentation for Eurofoil operations, Rugles in France and Dudelange in Luxembourg. Supply chain activities included in the Audit Scope: • Casthouses • Post-Casthouse All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

At the time of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Policy regarding Audits, Audit-Related Travel and Coronavirus.

Surveillance Audit (19 May 2022)
The Audit Scope related to the Chain of Custody process and documentation for Eurofoil operations, Rugles in France and Dudelange in Luxembourg.

Supply chain activities included in the Audit Scope:

- Casthouses
- Post-Casthouse

Criteria in the ASI Chain of Custody Standard that were identified as non-conformities and those that provide an overall context to the non-conformities were included in the Audit Scope.

Re-Certification Audit (3 – 26 May 2023)
The Audit Scope included Eurofoil Rugles, France and Eurofoil Dudelange, Luxembourg.

Supply chain activities included in the Audit Scope:

- Casthouses
- Post-Casthouse

Criteria in the ASI Chain of Custody Standard that were identified as non-conformities and those that provide an overall context to the non-conformities were included in the Audit Scope.

Surveillance Audit and Scope Change (29 – 30 July 2025)
The Audit Scope included Eurofoil Dudelange, Luxembourg.

Supply chain activities included in the Audit Scope:

- Casthouses
- Post-Casthouse

Criteria in the ASI Chain of Custody Standard that were identified as non-conformities and those that provide an overall context to the non-conformities were included in the Audit Scope.

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	26 May 2023 – 31 May 2028
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	31 May 2028
CERTIFICATE NUMBER	81

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member, thereby committing to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is certified to the ASI Performance Standard, as confirmed on the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/eurofoil
1.2 Management system	Conformance	Eurofoil has a defined global objective to achieve ASI Chain of Custody Standard Certification and a policy that has been communicated to all staff. A system based on existing procedures, data platforms and quality processes is utilised to manage CoC Material. The requirements of the ASI Chain of Custody Standard are specified in the Quality Manual. During the audit, the Auditors undertook a sample traceability test on the Entity's IT system to trace finished Products to Input Materials during the production process to test the effectiveness of the Entity's CoC Management System.
1.3 Management system reviews	Conformance	The Entity's ASI Manual was last updated in July 2025 and is updated every five years. Additionally, operational and sustainability indicators are reviewed during management review meetings, and the Entity also holds review meetings specific to Quality, Health, Safety and the Environment which include ASI-related items.
1.4 Management representative	Conformance	Overall conformance with the ASI Chain of Custody Standard rests with the Eurofoil CEO's and is integrated with the quality management conformance requirements. A number of different roles have responsibility for implementing the various aspects of the Standard with the main responsibility resting with the Quality Manager at each site, as outlined in the Quality Manual.
1.5 Training	Minor Non-Conformance	Training relating to ASI CoC has been undertaken at the Entity, which whilst demonstrating a thorough understanding of Aluminium traceability aspects, it is currently insufficient in understanding other related aspects including supplier risk assessment.
1.6 Record keeping	Conformance	The Entity has information systems that are up to date and document retention periods of five years, which was confirmed through the review of the Quality Management System documentation. Information

CRITERION	RATING	COMMENT
		security is maintained through existing IT system security procedures.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has systems in place to report on Input and Output Quantities of CoC Materials over the calendar year.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has systems in place to report on Input Percentages calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has systems in place to report the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has systems in place to report the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has systems in place to report the total Input Quantity of Eligible Scrap.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity has systems in place to report the quantity of ASI Aluminium allocated to ASI Credits in the calendar year.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity has systems in place to report the quantity of ASI Credits purchased in the calendar year.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics).
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics).
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics).
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics).
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only

CRITERION	RATING	COMMENT
		used for tasks such as shipping, maintenance, landscaping and logistics).
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics).
2.5 Error management	Not Applicable	This Criterion is not applicable as the Entity has no relevant Outsourcing Contractors (contractors are only used for tasks such as shipping, maintenance, landscaping and logistics). In the case of an error, an incident audit is triggered if there is a quality issue in the process or product for the customer.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	Documentation review confirmed that the Entity's Casthouses are within the Entity's CoC Certification Scope and legally owned by Eurofoil.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity is certified to the ASI Performance Standard, refer to: https://aluminium-stewardship.org/about-asi/asi-members/eurofoil
5.2 Casthouse Products	Conformance	Material flows are traceable from the finished Product to the mother coil, and through to the Casthouse furnace, and the input materials can be identified on the Entity's Material Accounting System (i.e., ingot/metal suppliers and country of origin). Each input is traceable and linked to the production system. CoC Material Inputs are recorded in the same way and tracked through the various process stages. The Outputs from the Casthouses are allocated a unique identification number. During the audit, the data flow has been tested using Casthouse product samples on the Entity's production system and confirmed on the site tour.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Casthouse and Post-Casthouse activities are part of the same facility. Documentation review shows that Eurofoil holds appropriate legal ownership, and the ASI website shows that Post-Casthouse activities are within the CoC Certification scope.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity, which include Post-Casthouse activities, is certified to the ASI Performance Standard: https://aluminium-stewardship.org/about-asi/asi-members/eurofoil
6.1c Sourcing ASI Aluminium	Conformance	The Materials Accounting Systems and CoC Management System (within the Quality Management System) as well as site visits and documentation review have confirmed that the only CoC Material that flows through the Entity's Casthouses enters the Post-Casthouse process stage, and that this is within the Entity's CoC Certification Scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	A review of the Supplier Code of Conduct and Responsible Sourcing Policy confirmed it addresses the requirements of the ASI Performance Standard covering anti-Corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas.

CRITERION	RATING	COMMENT
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	A review of the Supplier Code of Conduct and Responsible Sourcing Policy confirmed it covers all the requirements of the ASI Performance Standard, including anti-Corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas. These documents are shared with suppliers. A review of the Entity's risk assessment and examples of communication with intermediaries on Due Diligence was carried out.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	A review of the Supplier Code of Conduct and Responsible Sourcing Policy confirmed it covers all the requirements of the ASI Performance Standard, including anti-Corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	A review of the Supplier Code of Conduct and Responsible Sourcing Policy confirmed it covers all the requirements of the ASI Performance Standard, including anti-Corruption, responsible sourcing, Human Rights Due Diligence and Conflict-Affected and High-Risk Areas.
7.2 Risk assessment	Minor Non-Conformance	The Entity has implemented a central procurement function for metals sourcing. A supply chain risk assessment exists, however it is not sufficient nor up to date as the suppliers' ethical risk and impact has not sufficiently considered the source of information used for determining the risk level. This requirement is also not listed in the methodology, and the tracking of ethical supplier questionnaires' issuance, reception, signature and analysis was not up to date.
7.3 Complaints mechanism	Conformance	The Entity has a complaints mechanism that allows interested parties to voice concerns about compliance with its responsible sourcing Policy.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity uses a CoC percentage indicator which is identified from incoming material documentation, then flows through existing processes, with documented procedures, defined responsibilities and controls in place. Parameters and calculations in place ensure that the CoC percentage remains associated to the material as it enters the facility and moves through different processes. This is balanced out through procedures to associate the input percentage to the Output by mass. CoC documentation is generated to be passed onto the customer. Data are collated over the Material Accounting Period to enable reporting to ASI.

CRITERION	RATING	COMMENT
		To date there have been no CoC Material passing through the Entity.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Entity has a Material Accounting System where a Material Accounting Period of 12 months has been defined. The Entity's system can deliver data covering the given period.
8.4 Input Percentage	Conformance	The Entity has materials reception and input inventory processes which take into account the Input Percentage from the documentation provided by the supplier.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Material Accounting System used by the Entity was reviewed to confirm that they can track the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Material, by mass.
8.7 Output Quantity designation	Conformance	Provisions have been made for reporting from the Material Accounting Systems to be able to show the mass of material output and sale of Non-CoC Material, and the mass of the outputs and sales of 100% CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Material Accounting System enables any Pre-Consumer Scrap from processing to be identified and tracked. This means that Eligible Scrap inputs and outputs will also be tracked.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System has controls in place to ensure the total output of CoC Material and/or Eligible Scrap does not exceed the Input Percentage of CoC Material over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	At present, the Entity's Material Accounting System does not enable an Internal Overdraw as it only balances the exact inputs to the outputs. The system has the ability to show this on annual reporting should there be a Force Majeure situation

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		and when CoC Material requests commence. There is provision for such a situation in the procedures and process documentation.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System balances the exact inputs to the outputs and does not allow an Internal Overdraw. However, the Entity has documented a procedure to ensure that should an Internal Overdraw be required, it will not exceed the amount of CoC Material affected by a Force Majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has developed procedures that take into account a Force Majeure situation and which detail that any Internal Overdraw shall be made up in the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System specification documentation identifies the requirement to record and report any carry over of a Positive Balance.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System specification documentation identifies the requirement to record and report any carry over of a Positive Balance and indicate an expiry period.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has systems in place to ensure that a CoC Document accompanies each shipment or transfer of CoC Material. Metal procurement is centrally managed by the Entity. As there has not been any CoC Material passing through the Entity to date, no CoC Documentation has been issued.
9.2a Date of issue	Conformance	The Entity has updated their Material Accounting System by introducing new functionality into their IT system that is able to issue CoC Documents when the test certificate is released for CoC Certified Entities. The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material. As there has not been any CoC Material passing through the Facilities to date, no CoC Documentation has been issued. Therefore, effectiveness of the

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		process needs to be reconfirmed at subsequent surveillance audits.
9.2b Reference number	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2c Issuing Entity	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2d Receiving customer	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2e Responsible employee	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2f Conformance statement	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC

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		Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2g Type of CoC Material	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2h Mass of CoC Material	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.2i Mass of total material	Conformance	The Entity has a CoC Document template available in Annexes to the Materials Accounting System documents. The template is based on ASI requirements and includes: date of issue; reference number; name, address and CoC Certification number of the issuing Entity; name, address and CoC Certification number of the receiving Entity; verification contact; conforming statement; type of CoC Material in the shipment; mass of CoC Material and; mass of total Material.
9.3a Sustainability Data (optional)	Conformance	The Entity has an Environmental Report that is publicly available on the Eurofoil website. Whilst the information that can be shared with CoC Certified Entities is not completely consistent with a format that breaks down Casthouse and Post-Casthouse activities, the average intensity of Greenhouse Gases (GHG) emissions in tonnes CO_2e per metric tonne ASI Aluminium, based on monthly energy and production results is shared. Eurofoil's global LCA is also shared upon customer request. As there has not been any CoC Material passing through the Entity to date, no CoC Documentation has been issued. Therefore, effectiveness of the process needs to be reconfirmed at subsequent surveillance audits.

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9.3b Sustainability Data (passing on)	Conformance	The Entity has an Environmental Report that is publicly available on the Eurofoil website. Whilst the information that can be shared with CoC Certified Entities is not completely consistent with a format that breaks down Casthouse and Post-Casthouse activities, the average intensity of GHG emissions in tonnes CO_2e per metric tonne ASI Aluminium, based on monthly energy and production results is shared. Eurofoil's global LCA is also shared upon customer request.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity's CoC Document template includes space for the inclusion of optional sustainability information. The Entity's ASI Performance Standard Certification status is provided on this template as this is known through customer and supplier relationships and verifiable through the Eurofoil website.
9.4 Supplementary Information (optional)	Conformance	The procedures in place indicate that the IT system will issue CoC Documents to accompany each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. This document content includes a field for Supplementary Information which is supportable by objective evidence.
9.5 Response to verification requests	Conformance	The procedures in place show that the CoC Document content will be issued automatically from the IT system; verification that the system delivers accurate data is carried out by the Quality Department before releasing it to the Sales Department. In case of an error in the issuing of initial CoC Documents, manual corrections will be undertaken by authorised persons and a new CoC Document can be submitted. Any concerns about CoC Document information can be raised through normal relationships or the defined complaints procedure.
9.6 Error management	Conformance	Existing traceability and complaints mechanisms are in place at the Entity for other certification requirements. The Entity has an incident process that is triggered if there is a quality issue. This is tested annually. Quality systems have overall ownership of the CoC Management System. Traceability and complaints mechanisms are linked to ISO 9001 and IATF certification requirements.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has systems in place to ensure that all required information is included in received CoC Documents. Metal procurement is centrally managed. Pre-approvals and specifications are checked to ensure incoming Materials meet business needs

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		including for CoC Material and that checks to ensure all ASI required data are made. As there has not been any CoC Material passing through the Entity to date, no CoC Documentation has been issued.
10.2 Verify consistency with shipments	Conformance	The Entity has adequate systems in place to ensure that all required information in received CoC Documents has been included. Metal procurement is centrally managed. Pre-approvals and specifications are checked to ensure incoming Materials meet business needs including for CoC Material and that checks to ensure all ASI required data are made and that the incoming shipments are consistent with the documentation. This was confirmed through process and document review. As there has not been any CoC Material passing through the Entity to date, no CoC Documentation has been issued. Therefore, effectiveness of the process needs to be reconfirmed at subsequent surveillance audits.
10.3 Verify supplier CoC Certification status	Conformance	The Quality Manager at the Dudelange site monitors incoming ASI communications and performs a weekly check of the ASI website to maintain an ASI membership status list. This list includes the Entity's suppliers and customers.
10.4 Error management	Conformance	The Entity performs a check on incoming Materials. Firstly, pre-approvals regarding ASI criteria are made by the Metal Procurement Manager. If an error is identified and incoming shipments do not conform to quality or ASI requirements, materials are refused or stored and then returned if they cannot be used. There are procedures in place to record the errors and develop actions to avoid a recurrence.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Conformance	The Entity's Material Accounting System (AS400) enables Credits to be allocated should excess Material be present. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.1b Link to Casthouse Products	Conformance	The Entity's systems enable a unique number to be allocated to each coil produced and in turn associated with the % of CoC Material handled each day, i.e., a % of coils will be CoC Material. The systems will be able to allocate this % to ASI Credits if required.

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11.1c No double counting	Conformance	The Entity's systems enable a unique number to be allocated to each coil produced and in turn associated with the % of CoC Material handled each day, i.e., a % of coils will be CoC Material. The systems ensure that the Material cannot be double counted.
11.1d No Positive Balance for ASI Credits	Conformance	The Entity's systems enable ASI Credits to be calculated. Procedures state that any Positive Balance of ASI Credit Material cannot be carried over to the subsequent Material Accounting Period.
11.2a Date of issue	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements for issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties and; the quantity of the ASI Credits. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2b Reference number	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements for issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties and; the quantity of the ASI Credits. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2c Issuing Entity	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements for issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties and; the quantity of the ASI Credits. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2d Receiving Entity	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements for issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing

CRITERION	RATING	COMMENT
		Entity and the receiving parties and; the quantity of the ASI Credits. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2e Conformance statement	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements for issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties; the quantity of the ASI Credits and; appropriate statements. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2f ASI Credits statement	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties; the quantity of the ASI Credits and; appropriate statements. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.2g Quantity	Conformance	The specifications of the Entity's Material Accounting and reporting system include a template based on the ASI requirements of issuing CoC ASI Credits which include: date of issue; reference number linked to the Material Accounting System; identity, address, contact email and CoC Certification number of the issuing Entity and the receiving parties and; the quantity of the ASI Credits. To date, no ASI Credits have been issued or purchased. This Criterion should be re-evaluated once CoC Material is received.
11.3a CoC Certification Scope – purchasing ASI Credits	Conformance	The EHS and Quality Manager at the Dudelange site is responsible for keeping an up to date list of ASI Members based on information issued by ASI via email communications and on its website. The list has information to confirm the purchasing Entities' CoC Certification Scope.
11.3b Material Accounting System – purchasing	Conformance	The specifications of the Material Accounting and reporting system include a reference to allocating Credits and purchasing Credits. This has not been

CRITERION	RATING	COMMENT
		able to be tested as no ASI Credits have been purchased.
11.3c Expiry	Conformance	The specifications of the Material Accounting and reporting system include a reference to allocating Credits and purchasing Credits, including that they expire at the end of the accounting period and cannot be carried over. This has not been able to be tested as no credits have been purchased and should be tested at subsequent surveillance audits.
11.3d No re-trading	Conformance	The specifications of the Material Accounting and reporting system include information stating ASI Credits cannot be re-traded.
11.3e No allocation to physical products	Conformance	The specifications of the Material Accounting and reporting system include information covering Credits not being allocated to physical products or otherwise claimed as ASI Aluminium. As no CoC Material has been traded, it has not been possible to check actual certificates or records.
11.3f Verify supplier CoC Certification status	Conformance	The Quality Manager at the Dudelange site reviews ASI email communications and information on the website to maintain an up to date list of ASI Certification statuses and scopes. It is monitored for any changes.
11.3g Five years maximum for ASI Credits purchasing	Conformance	The procedure and documented information provide controls to ensure that any ASI Credits purchased are only done so for a maximum of five years.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity makes an ASI claim on its public website at https://www.eurofoil.com/sustainability, which has been prepared in accordance with the ASI Claims Guide and approved by ASI.
12.1b Verifiable evidence	Conformance	The Entity makes an ASI claim on its public website at https://www.eurofoil.com/sustainability, which has been prepared in accordance with the ASI Claims Guide and approved by ASI. The Entity does not currently make any ‘on-product’ claims.
12.1c Employee training	Conformance	The Entity's relevant members of its management team are aware of ASI claims rules and requirements.

Document Control and Version History

Revision	Date	Notes
0	22 May 2020	Initial Certification Audit – Full Certification
1	11 July 2022	Surveillance Audit
2	30 June 2023	Re-Certification Audit – Full Certification
3	27 November 2025	Surveillance Audit and Scope Change to remove Eurofoil France from the Certification Scope.
4	29 October 2026	The Entity was acquired from by Jiangsu Zhongji Lamination Materials from Eurofoil in April 2026. Extension to the Certification expiry date (from 25 May 2026), consistent with ASI's voluntary option for CoC Standard Certification extension.