

ASI CERTIFICATION  
CHAIN OF CUSTODY  
STANDARD



PRESENTED TO

**CONSTELLIUM  
NEUF-BRISACH**

CERTIFICATE  
NUMBER

106

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

GUTCERT  
(AFNOR  
GROUP)

DATE OF ISSUE

2 DECEMBER 2020

DATE OF EXPIRY

1 DECEMBER 2023

CERTIFIED SINCE

2 DECEMBER 2020

AUTHORISED BY

A handwritten signature in white ink on a dark grey background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Casting, rolling, finishing and recycling facilities of  
Constellium Neuf-Brisach site (France).

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Neuf-Brisach
CERTIFICATION SCOPE	Casting, rolling, finishing and recycling facilities of Constellium Neuf-Brisach site (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Chain of Custody Standard V1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Certification Audit</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	14 - 16 October 2020
AUDIT REPORT SUBMISSION	11 November 2020
AUDIT SCOPE	<p>The audit scope included casting, rolling, finishing and recycling facilities at Neuf-Brisach facility.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Post-Casthouse</li></ul> <p>Relevant Criteria from the ASI Chain of Custody Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li></ul>

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- ✔ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
  - ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION PERIOD	2 December 2020 – 1 December 2023
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	1 June 2022
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CERTIFICATE NUMBER	106
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	<p>Constellium has been an ASI Member since January 2015 under the Production and Transformation membership class (please refer to: <a href="https://aluminium-stewardship.org/about-asi/asi-member-listing/">https://aluminium-stewardship.org/about-asi/asi-member-listing/</a>).</p> <p>Constellium has operational control over the Entity of Neuf-Brisach included in the scope of the ASI Chain of Custody Standard.</p>
1.2 Management system	Conformance	<p>The Entity has implemented a Management System that addresses all applicable requirements of the Chain of Custody Standard. Objectives, scope, responsibilities, are well defined in the Management System. Resources are provided to ensure its implementation.</p>
1.3 Management system reviews	Conformance	<p>The Entity has defined periodic reviews and updates of the Chain of Custody Management System, integrated with the global management system reviews of the Entity, in order to improve the Chain of Custody Management System.</p>
1.4 Management representative	Conformance	<p>The Entity has nominated a Management Representative (Head of Metal manager) having overall responsibility and authority for the Entity's conformance with all applicable requirements of the CoC Standard.</p>
1.5 Training	Conformance	<p>The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody (CoC) Standard.</p> <p>Adequate training was provided to the CoC operational team.</p>
1.6 Record keeping	Conformance	<p>The Entity has implemented a procedure to maintain up-to-date records covering all applicable requirements of the Chain of Custody Standard. According to this procedure, records are kept for a minimum of 5 years. All records requested during the audit were made available.</p>
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Input and Output Quantities of CoC Materials over the calendar year are included within the Procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Input Percentage calculated for the calendar year is included within the procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>
1.7c Reporting to ASI (Positive Balance)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Maximum Positive Balance in the calendar year is included within the procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>
1.7d Reporting to ASI (Internal Overdraw)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Maximum Internal Overdraw within the calendar year and the percentage of Input Quantity of CoC Material this represents are included within the procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>
1.7e Reporting to ASI (Eligible Scrap)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Total Input Quantity of Eligible Scrap with a breakdown by Post-consumer/Pre-consumer in the calendar year are included within the Procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	<p>The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Quantity of ASI Aluminium allocated to ASI Credits in the calendar year is included within the procedure.</p> <p>As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.</p>

CRITERION	RATING	COMMENT
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Quantity of ASI Credits purchased in the calendar year is included within the procedure. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.

## 2 OUTSOURCING CONTRACTORS

2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.2a Control of CoC Material	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.2b No further outsourcing	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.2c Risk assessment	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.3 Output Quantity	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.4 Verification and record-keeping	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.
2.5 Error management	Not Applicable	No Outsourcing Contractors are included within the Entity's Certification Scope.

## 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.

CRITERION	RATING	COMMENT
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	Conformance	ASI Liquid Metal is produced only from the recycling facility of the Entity, which is within the Chain of Custody Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	ASI Liquid Metal is produced only from the recycling facility of the Entity, which is within the Entity's ASI Performance Standard certification scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has implemented a process to account for Eligible Scrap as only CoC Pre-Consumer Scrap and aluminium are recovered from Dross subject to supplier due diligence. Coherence of the process was checked.
4.2b Post-Consumer Scrap	Conformance	The Entity has implemented a process to account for eligible scrap as only postconsumer scrap subject to supplier due diligence. Coherence and correct implementation of the process were checked.
4.3a Supplier records	Conformance	The Entity has implemented a system to record the identity, principals and places of operation of all direct suppliers of recyclable material, through its SAP software. This process was reviewed and is correctly applied.
4.3b Cash payments	Conformance	Within the Entity, no cash payment with direct suppliers of Recyclable Scrap Material are allowed, and then performed.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	ASI Aluminium is produced only from Casthouse of the Entity, which is within the Chain of Custody Certification Scope.
5.1b ASI Performance Standard – Casthouses	Conformance	ASI Aluminium is produced only from Casthouse of the Entity, which is within the Entity's ASI Performance Standard Certification Scope.
5.2 Casthouse Products	Conformance	There is a full traceability through product identification on all shipments and deliveries from the Casthouses. The unique identification system, supported by the ERP and production systems, can be linked to the Input Quantity of CoC Material for the Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's rolling and finishing shops are Post-Casthouse activities within the CoC Certification Scope.

CRITERION	RATING	COMMENT
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity's rolling and finishing shops are Post-Casthouse activities within the Entity's Performance Standard Certification Scope.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has currently defined that the Post-Casthouse Facility could only source ASI Aluminium from another ASI Certified Entity of Constellium. At the time of audit, no ASI Aluminium is being sourced at the Post-Casthouse Facility.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material. This code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes an Anti-Corruption Criteria.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material. This code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes Responsible Sourcing.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material. This code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes Human Rights Due Diligence.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material. This code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes a Conflict-Affected and High-Risk Areas Criteria.
7.2 Risk assessment	Conformance	The Entity has implemented procedures to assess the risks of non-compliance with its Responsible Sourcing Policy by its suppliers of Non-CoC and Recyclable Scrap Material. A specific risk assessment matrix has been developed for recyclable scrap suppliers. Due Diligence checks are performed mainly using the ECOVADIS platform. Results of risk assessment and Due Diligence are well documented. Actions are undertaken if necessary to mitigate the risk assessed. A sample of Non-CoC and recyclable scrap suppliers were reviewed and risk assessments/Due Diligence checks verified during the audit.



CRITERION	RATING	COMMENT
7.3 Complaints mechanism	Conformance	The Entity has implemented a procedure to report periodically information to the ASI Secretariat, within 3 months after the end of each calendar year. Input and Output Quantities of CoC Materials over the calendar year are included within the procedure. As there has been no sourcing and transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this communication will be assessed at the next Surveillance Audit.

8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM

8.1 Material Accounting System	Conformance	The Entity has created a Material Accounting System, with specific instructions, to record input and Output Quantity of CoC and Non-CoC Material, by mass. As there has been no sourcing and transfer of CoC Material at the time of this first Certification Audit, only a simulation of this Material Accounting System was performed. Coherence of this simulation was checked during the audit and the result was satisfactory. The real effectiveness of this Material Accounting System will be assessed at the next Surveillance Audit.
8.2a Post-Consumer Scrap	Conformance	Record of the breakdown of recyclable scrap (included Input Quantity of Post-Consumer Scrap) is integrated within the Material Accounting System.
8.2b Pre-Consumer Scrap (total)	Conformance	Record of the breakdown of recyclable scrap (included Input Quantity of total Pre-Consumer Scrap) is integrated within the Material Accounting System.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	Record of the breakdown of recyclable scrap (included Input Quantity of Pre-Consumer Scrap that is Eligible Scrap) is integrated within the Material Accounting System.
8.3 Material Accounting Period	Conformance	The Entity has defined a Material Accounting Period of 12 months (from 01/01 to 31/12).
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same.
8.6 Output Quantity determination	Conformance	The Entity uses the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material, by mass.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	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.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	For Pre-Consumer Scraps produced by the Entity, the Input Percentage of the Material Accounting Period is used to determine the Output Quantity of Eligible Scrap.
8.9 Outputs not exceed inputs	Conformance	The Entity has implemented a procedure to check that the total output of CoC Material and Eligible Scrap does not proportionally exceed the Input Percentage as applied to total input of CoC Material and Eligible Scrap over the Material Accounting Period.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure that max. 20% overdraw of total Input Quantity of CoC Material will happen within the Material Accounting Period in case of force majeure.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will not exceed the amount of CoC Material affected by the force majeure situation.
8.10c Internal Overdraws (period to make up)	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.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System is designed to ensure that any carry over of a Positive Balance is clearly identified.
8.11b 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 Shipments and transfers	Conformance	In agreement with ASI, the Entity has defined that a CoC Document will be issued monthly to each customer to summarize all batches shipped. A link between the monthly document and individual shipments will be effective.  As there has been no transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this CoC documentation management will be assessed at the next Surveillance Audit.
9.2a Date of issue	Conformance	The Entity has integrated CoC information in the CoC Document including date of issue.

CRITERION	RATING	COMMENT
9.2b Reference number	Conformance	The Entity has integrated CoC information in the CoC Document including a reference number linked to the Entity's Material Accounting System.
9.2c Issuing Entity	Conformance	The Entity has integrated CoC information in the CoC Document including the identity, address and CoC Certification Number of the Entity issuing the CoC Document.
9.2d Receiving customer	Conformance	The Entity has integrated CoC information in the CoC Document including the identity and address of the customer receiving the CoC Material, and their CoC Certification Number (if certified).
9.2e Responsible employee	Conformance	The Entity has integrated CoC information in the CoC Document including the responsible employee of the Entity who can verify information in the CoC Document.
9.2f Conformance statement	Conformance	The Entity has integrated CoC information in the CoC Document including the following statement "the information provided in the CoC Document is in conformance with the ASI CoC Standard".
9.2g Type of CoC Material	Conformance	The Entity has integrated CoC information in the CoC Document including the type of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity has integrated CoC information in the CoC Document including the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity has integrated CoC information in the CoC Document including the mass of CoC Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	The Entity does not currently intend to include Sustainability Data regarding GHG emissions, in the CoC Document.
9.3b Sustainability Data (passing on)	Not Applicable	The Entity does not currently intend to include Sustainability Data regarding GHG emissions, in the CoC Document.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has included the information about ASI Performance Standard Certification, Certification Number and date of validity in its CoC Document.
9.4 Supplementary Information (optional)	Conformance	The Entity has defined that any Supplementary Information included in the CoC Document must be supported by objective evidence. It is currently the case for the only information provided.

CRITERION	RATING	COMMENT
9.5 Response to verification requests	Conformance	The Entity has defined the responsibilities and created a generic mailbox to respond to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error management	Conformance	The Entity has defined in a procedure the way errors regarding CoC shipments must be handled (documentation of the error, root cause analysis, communication, improvement actions to avoid recurrence).
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has defined in a procedure the way to verify the received CoC Documents. A specific check list has been created. Tests of checklist performed 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 Verify consistency with shipments	Conformance	The Entity has defined in a procedure that the verification of received CoC Documents has to take place before recording information in the Material Accounting System. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this practice will be assessed at the next Surveillance Audit.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined a quarterly check of the validity and scope of supplier's ASI CoC Certification.
10.4 Error management	Conformance	The Entity has defined in a procedure the way errors regarding CoC Documents (discovered after CoC Material or Eligible Scrap have been received) must be handled (documentation of the error, root cause analysis, communication, improvement actions to avoid recurrence).
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.

CRITERION	RATING	COMMENT
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System for the time being.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	<b>Conformance</b>	<p>The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide.</p> <p>As there has 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.</p>

CRITERION	RATING	COMMENT
12.1b Verifiable evidence	Conformance	<p>The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. The Entity has demonstrated awareness that all ASI-related claims have to be supported by verifiable evidence</p> <p>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.</p>
12.1c Employee training	Conformance	The Entity has trained relevant employees regarding ASI claims and/or representations.

**Document Control and Version History**

Revision	Date	Notes
0	2 December 2020	First Certification Audit