

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# SIG COMBIBLOC

CERTIFICATE  
NUMBER

8

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

12 OCTOBER 2021

DATE OF EXPIRY

11 OCTOBER 2024

CERTIFIED SINCE

12 OCTOBER 2018

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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

SIG Combibloc Group including Head Office - Department Corporate Responsibility in Linnich (Germany), the centralised Procurement Organisation in Neuhausen (Switzerland) and the production sites in Saalfelden (Austria), Wittenberg (Germany) and Linnich (Germany), Rayong (Thailand), Riyadh (Saudi Arabia), Suzhou (China), Suzhou AP3 (China) and Curitiba (Brazil).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	SIG Combibloc
ENTITY NAME	SIG Combibloc Group
CERTIFICATION SCOPE	SIG Combibloc Group including Head Office (Department Corporate Responsibility) in Linnich (Germany), the centralised Procurement Organisation in Neuhausen (Switzerland) and the production sites in Saalfelden (Austria), Wittenberg (Germany), Linnich (Germany), Rayong (Thailand), Riyadh (Saudi Arabia), Suzhou (China), Suzhou AP3 (China) and Curitiba (Brazil).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><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>• Initial Certification Audit (23 August – 17 September 2018)</li><li>• Scope Change Audit (5 – 6 March 2019)</li><li>• Scope Change Audit (20 – 21 January 2020)</li><li>• Scope Change Audit (26 – 27 March 2020)</li><li>• Surveillance Audit (31 March – 7 April 2021)</li><li>• Re-Certification Audit (7 – 13 October 2021)</li><li>• Scope Change Audit (25 - 26 November 2021)</li><li>• Scope Change Audit (16 – 17 January 2022)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 23 August - 17 September 2018 (Initial Certification Audit)</li><li>• 5 - 6 March 2019 (Scope Change Audit)</li><li>• 20 - 21 January 2020 (Scope Change Audit)</li><li>• 26 - 27 March 2020 (Scope Change Audit)</li><li>• 31 March 2020 – 7 April 2020 (Surveillance Audit)</li><li>• 7 – 13 October 2021 (Re-Certification Audit)</li><li>• 25 – 26 November 2021 (Scope Change Audit)</li><li>• 16 – 17 January 2022 (Scope Change Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 28 September 2018 (Initial Certification Audit)</li><li>• 13 March 2019 (Scope Change Audit)</li><li>• 14 February 2020 (Scope Change Audit)</li></ul>

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- 26 May 2020 (Scope Change Audit)
  - 10 February 2021 (Surveillance Audit)
  - 15 November 2021 (Re-Certification Audit)
  - 1 March 2022 (Scope Change Audit)
  - 12 April 2022 (Scope Change Audit)
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#### AUDIT SCOPE

##### Initial Certification Audit (23 August - 17 September 2018)

The audit scope includes the Head Office (Department Corporate Responsibility, SIG International Services GmbH) in Linnich (Germany) and the Procurement Organisation (SIG Combibloc Procurement AG) in Neuhausen (Switzerland) and the SIG Combibloc GmbH & Co. KG production site in Saalfelden (Austria).

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

##### First Scope Change Audit (5 – 6 March 2019)

The audit scope covered the activities at the SIG Combibloc GmbH production sites in Wittenberg (Germany) and Linnich (Germany).

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

##### Second Scope Change Audit (20 – 21 January 2020)

The audit scope covered the activities at the SIG Combibloc Thailand Ltd production site in Rayong (Thailand) and SIG Combibloc (Suzhou) Co. Ltd production site in Suzhou (China).

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

##### Third Scope Change Audit (26 – 27 March 2020)

The audit scope covered the activities at the SIG Combibloc do Brasil Ltda production site in Curitiba (Brazil).

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

##### Surveillance Audit (31 March 2020 – 7 April 2020)

The audit scope covered the activities at Head Office (Department Corporate Responsibility) in Linnich (Germany) and the SIG Combibloc GmbH & Co. KG production site in Saalfelden (Austria).

Supply chain activities included in the audit scope:

- Post-Casthouse
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Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

At the time of the audit (March and April 2020), access to the sites was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification Audit (7 – 13 October 2021)

The audit scope for SIG Combibloc Group covered Head Office (Department Corporate Responsibility) in Linnich (Germany), the centralised Procurement Organisation in Neuhausen (Switzerland) and the production sites in Saalfelden (Austria) and Linnich (Germany).

The ASI multi-site sampling approach was undertaken to include the Wittenberg (Germany), Rayong (Thailand), Suzhou (China) and Curitiba (Brazil) facilities.

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

Fourth Scope Change Audit (25 - 26 November 2021)

The audit scope for SIG Combibloc Group covered the Suzhou AP3 facility in China.

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

Fifth Scope Change Audit (16 – 17 January 2022)

The audit scope for SIG Combibloc Group covered the Riyadh site in Saudi Arabia.

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Certification

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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.
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CERTIFICATION PERIOD	12 October 2021 – 11 October 2024
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	11 April 2023
CERTIFICATE NUMBER	8

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	SIG Combibloc holds an ASI Membership in the Industrial User category. The Entity's ASI membership information is available on ASI website: <a href="https://aluminium-stewardship.org/about-asi/asi-members/sig-combibloc">https://aluminium-stewardship.org/about-asi/asi-members/sig-combibloc</a>
1.2 Management system	Minor Non-Conformance	The Entity has created a Management System for handling ASI Material and use of the ASI logo. A standard operating procedure describes in the detail the SIG Management System, responsibilities, functions, processes and workflows, documentation and record retention and handling of non-conforming product deliveries. A Responsibility Matrix (RACI) has been developed to address the tasks related to the management of the ASI Chain of Custody Standard implementation in connection with the roles and functions in the organization. The Management System has been adopted at Suzhou, Rayong, Curitiba, Suzhou AP3 and Riyadh sites. However, the Business Service Center in Romania which is responsible for part of the process associated with receiving and issuing CoC Documents does not have its responsibilities and authorities defined in the RACI Matrix of the Standard Operating Procedure.
1.3 Management system reviews	Conformance	The Entity has established policies, systems, procedures and processes to comply with ASI Chain of Custody Criteria regarding the periodic review of the Management System and associated updates as required. Management review results are based on internal audit results in September 2021.
1.4 Management representative	Conformance	The Entity has appointed a member of management as the responsible person for the implementation of the ASI Chain of Custody Standard and defined a chart of responsibilities for different tasks through the organization. Representatives have been nominated for implementation of the ASI Chain of Custody Standard at the site level. The Suzhou and Suzhou AP3 sites share the same management team.
1.5 Training	Conformance	The Entity has developed and implemented communications and training measures that make relevant personnel aware of and competent in their

CRITERION	RATING	COMMENT
		<p>responsibilities under the ASI Chain of Custody Standard. The Entity has developed and maintains communication measures to keep all personnel updated about their roles and responsibilities and provides adequate training for them to carry out these tasks.</p> <p>The training plan covering 2019 – 2021 for all sites and key employees was sighted.</p>
1.6 Record keeping	Conformance	<p>The Entity maintains up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity's standard operating procedure defines the retention time as required by the ASI Chain of Custody Standard. The Entity has adequate record management practices.</p>
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	<p>The Entity's operating procedure specifies that the Entity reports Input and Output Quantities of CoC Material to the ASI Secretariat within 3 months after the end of each calendar year which conforms to the ASI Chain of Custody Standard requirements. Reporting for 2020 was conducted on 1 April 2021.</p>
1.7b Reporting to ASI (Input Percentage)	Conformance	<p>The Entity's operating procedure specifies that the Entity reports Input Percentages calculated for the calendar year to the ASI Secretariat within 3 months after the end of each calendar year which conforms to the ASI Chain of Custody Standard. Reporting for 2020 was conducted on 1 April 2021.</p>
1.7c Reporting to ASI (Positive Balance)	Conformance	<p>The Entity's operating procedure specifies that the Entity reports the Positive Balance carried over to the subsequent Material Accounting Period, if any to the ASI Secretariat within 3 months after the end of each calendar year which conforms to the ASI Chain of Custody Standard requirements. Reporting for 2020 was conducted on 1 April 2021.</p>
1.7d Reporting to ASI (Internal Overdraw)	Conformance	<p>The Entity's operating procedure specifies that the Entity will report the Internal Overdraw within the calendar year, if any and the percentage of Input Quantity of CoC Material this represent to the ASI Secretariat within 3 months after the end of each calendar year which conforms to the ASI Chain of Custody Standard requirements. Reporting for 2020 was conducted on 1 April 2021.</p>
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	<p>This Criterion is currently not applicable, as the Entity is not engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium.</p>

CRITERION	RATING	COMMENT
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is currently not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is currently not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2a Control of CoC Material	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.5 Error management	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		
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	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.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard – Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's operating procedures and strategic cooperation with ASI Certified suppliers secures the supply and production of ASI CoC Materials.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity holds an ASI Performance Standard Certification, available on the ASI website: <a href="https://aluminium-stewardship.org/about-asi/asi-members/sig-combibloc">https://aluminium-stewardship.org/about-asi/asi-members/sig-combibloc</a> The Entity is in the Industrial Users membership class. The Entity's operating procedures and strategic cooperation with ASI Certified suppliers will secure the supply and production of ASI CoC Materials.
6.1c Sourcing ASI Aluminium	Minor Non-Conformance	The responsibility for the invoice verification process is split between the Business Service Center Romania and the Supply Chain Management Department at Head Office. Invoices

CRITERION	RATING	COMMENT
		<p>are registered in SAP and an end-control of invoice check is conducted at Head Office.</p> <p>However, not all employees at the Business Service Centre Romania implement the invoice verification process.</p>
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy covering all aspects of the ASI Chain of Custody Standard and applicable ASI Performance Standard Criteria. The Entity has implemented different schemes addressing responsible sourcing, which includes SEDEX / SMETA and Ecovadis. Please see the SIG Business Ethics Conduct for Suppliers, paragraph 1, available at: <a href="https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf">https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf</a></p>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy covering all aspects of the ASI Chain of Custody Standard and applicable ASI Performance Standard Criteria. The Entity has implemented different schemes addressing responsible sourcing, which includes SEDEX / SMETA and Ecovadis. Please see the SIG Business Ethics Conduct for Suppliers, paragraph 1, available at: <a href="https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf">https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf</a></p>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>The Entity has developed policies, procedures and processes regarding responsible sourcing, Human Rights Due Diligence that conform to the ASI Chain of Custody Criteria and applicable ASI Performance Standard Criteria. The Entity has implemented a CSR (Corporate Social Responsibility) Portal which can be found at: <a href="https://sig.bravosolution.com/esop/tlg-host/public/sig/web/login.jst">https://sig.bravosolution.com/esop/tlg-host/public/sig/web/login.jst</a></p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has developed a Responsible Sourcing Policy covering all aspects of the ASI Chain of Custody Standard and applicable ASI Performance Standard Criteria. The Entity has implemented different schemes addressing responsible sourcing, which includes SEDEX / SMETA and Ecovadis. Please see the SIG Business Ethics Conduct for Suppliers, paragraph 1, available at: <a href="https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf">https://cms.sig.biz/media/3270/sig-businessethics-code-suppliers-en.pdf</a></p>
7.2 Risk assessment	Conformance	<p>The Entity's Responsible Sourcing Directive describes how the Entity is performing a risk</p>

CRITERION	RATING	COMMENT
		screening of their suppliers. Aluminium suppliers are identified as significant suppliers and are part of a program for continuous review of performance. The Entity is also conducting an EcoVadis assessment and SEDEX/SMETA audits within its supply chain. More information is available on the Entity's supply chain engagement programme: <a href="https://www.sig.biz/en/media/press-releases/highlighting-progress-on-sig-s-journey-way-beyond-good">https://www.sig.biz/en/media/press-releases/highlighting-progress-on-sig-s-journey-way-beyond-good</a>
7.3 Complaints mechanism	Conformance	The Entity has a documented complaints procedure and processes to address complaints and concerns related to ASI and non-compliance with the Responsible Sourcing Policy. The Entity has established the contact email: <a href="mailto:asi@sig.biz">asi@sig.biz</a>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Material Accounting System is based in the Entity's Enterprise Resource Planning (ERP) system. The Management System includes a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass.
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 demonstrated it will use a 12 month rolling period. This is stated in the Volume Control Table that has been developed for the ASI Chain of Custody Standard.
8.4 Input Percentage	Conformance	The Entity has established a Material Accounting System in compliance with ASI Chain of Custody requirements.
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 Entity has demonstrated it uses the mass balance calculation approach developed in an inventory file for management and calculations, including an ASI Volume Control Table. The

CRITERION	RATING	COMMENT
		Volume Control Table was reviewed during the audit.
8.7 Output Quantity designation	Conformance	The Entity has demonstrated its use of the mass balance calculation approach developed in an inventory file for management and calculations, including an ASI volume control table. The Entity's Output Quantity is designated as 100% CoC Material as per Material Accounting System procedures and processes.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable as the Entity does not intend to produce Pre-Consumer Scrap within their CoC Certification Scope.
8.9 Outputs not exceed inputs	Conformance	The Entity's Output Quantity is designated as 100% CoC Material as per Material Accounting System procedures and processes.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has demonstrated its use of the mass balance calculation approach it developed in an inventory for management and calculations, including an ASI volume control table. The Entity has demonstrated that the volume control table describes the different management tasks and also the requirement to demonstrate the maximum overdraw. The Entity has established internal controls to ensure the Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has demonstrated that its use of the mass balance calculation approach it developed in an inventory for management and calculations, including an ASI volume control table. The Entity has demonstrated that the volume control table describes the different management tasks and the requirement to demonstrate the maximum overdraw. The Entity has established internal controls to ensure the Internal Overdraw does not exceed 20% of total Input Quantity of CoC Material.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has demonstrated its use of the mass balance calculation approach it developed in an inventory for management and calculations, including an ASI volume control table. The Entity has established a Material Accounting System in compliance with ASI Chain of Custody Standard requirements.
8.11a Positive Balance (carry over)	Conformance	A Material Accounting System is in place and the functionality addresses the Criterion.

CRITERION	RATING	COMMENT
8.11b Positive Balance (expiry)	Conformance	A Material Accounting System is in place and the functionality addresses the Criterion.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has established a checklist for its Procurement and Order Department, ensuring that CoC Documents are controlled, issued and stored as per ASI Chain of Custody Standard requirements.
9.2a Date of issue	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2b Reference number	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2c Issuing Entity	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2d Receiving customer	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2e Responsible employee	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2f Conformance statement	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2g Type of CoC Material	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2h Mass of CoC Material	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.2i Mass of total material	Conformance	The Entity is providing information on invoices and CoC Documents as required by ASI Chain of Custody Standard.
9.3a Sustainability Data (optional)	Not Applicable	The Entity has opted not to include Sustainability Data. The Entity is utilising finished aluminium foil.
9.3b Sustainability Data (passing on)	Not Applicable	The Entity has opted not to include Sustainability Data. The Entity is utilising finished aluminium foil.

CRITERION	RATING	COMMENT
9.3c Post-Casthouse ASI Certification status	Not Applicable	The Entity has opted not to include Sustainability Data. The Entity is utilising finished aluminium foil.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable as the Entity has opted not to include Supplementary Information.
9.5 Response to verification requests	Conformance	The Entity has a documented complaints procedure and processes to address complaints and concerns related to ASI and includes the capacity to respond to reasonable requests for verification of information on the Entity's CoC Documents. The Entity has established the contact email: <a href="mailto:asi@sig.biz">asi@sig.biz</a>
9.6 Error management	Conformance	The Entity has implemented a procedure for managing its CoC Documents as required by the ASI Chain of Custody Standard, including the management of potential errors. The Entity's standard operation procedure for handling ASI Material and use of the ASI logo, specifies the process. If required, the central office will inform different stakeholders on the situation regarding the error and agree on necessary corrective actions.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Minor Non-Conformance	The Entity has established processes to ensure that CoC Documents are controlled, issued and stored as per ASI Chain of Custody Standard requirements. However, the Business Service Center in Romania which is responsible for part of the process associated with receiving CoC Documents, does not use the ASI CoC Checklist for invoice verification as required by Head Office.
10.2 Verify consistency with shipments	Minor Non-Conformance	The Entity has established processes to ensure that CoC documents are controlled, issued and stored which is conformant to ASI Chain of Custody Standard requirements. However, the Business Service Center in Romania which is responsible for part of the process associated with receiving CoC Documents, does not use the ASI CoC Checklist for invoice verification as required by Head Office.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has implemented a procedure with verification measures to review supplier's ASI Chain of Custody Certification status as required by the ASI Chain of Custody Standard.

CRITERION	RATING	COMMENT
10.4 Error management	Conformance	The Entity has implemented a procedure to review received CoC Documents as required by the ASI Chain of Custody Standard, including the management of potential errors.
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 ASI Credits within their CoC Certification Scope.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.1c No double counting	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2a Date of issue	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2b Reference number	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.2g Quantity	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.

CRITERION	RATING	COMMENT
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3c Expiry	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3d No re-trading	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable, as the Entity does not intend to use ASI Credits within their CoC Certification Scope.

## 12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has developed policies, systems, procedures and processes to ensure that claims and/or representations about CoC Material outside of CoC Documents are made in a manner and form consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity's operational procedures and the training of key personnel ensures the correct use of ASI claims.
12.1c Employee training	Conformance	The Entity's operational procedures and the training of key personnel ensures the correct use of ASI claims.

### Document Control and Version History

Revision	Date	Notes
0	12 October 2018	Issued
1	28 March 2019	Updated for Certification Scope change (addition of Wittenberg and Linnich (Germany)).
2	27 February 2020	Updated for Certification Scope change (addition of Rayong (Thailand) and Suzhou (China)).
3	29 May 2020	Updated for Certification Scope change (addition of Curtiba (Brazil)).
4	25 June 2020	Surveillance Audit for Head Office and the Saalfelden (Austria) site; Updated Audit Type, Audit Dates and Audit Report Submission sections for each previous scope change audit for clarity; Updated Audit Scope details for each previous audit.



Revision	Date	Notes
5	21 December 2021	Re-Certification Audit. Audit commenced prior to expiry of initial certification; Rollover of initial certification dates following ASI oversight and preparation of updated Certificate and Report.
6	9 March 2022	Scope Change Audit – Certification Scope updated to include Suzhou AP3, China.
5	22 April 2022	Scope Change Audit to include the Riyadh site, Saudi Arabia.