

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTELLIUM

AS&I EXTRUSION SINGEN, AUTOMOTIVE STRUCTURES GOTTMADINGEN AND DAHENFELD

CERTIFICATE
NUMBER

112

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

29 JANUARY 2021

DATE OF EXPIRY

28 JANUARY 2024

CERTIFIED SINCE

29 JANUARY 2021

AUTHORISED BY

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

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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

Extrusion plant of Constellium Singen (Germany) and
Automotive Structure production sites of
Gottmadingen (Germany) and Dahenfeld (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium AS&I Extrusion Singen, Constellium Automotive Structures Gottmadingen and Dahrenfeld
CERTIFICATION SCOPE	Extrusion plant of Constellium Singen (Germany) and Automotive Structure production sites of Gottmadingen (Germany) and Dahrenfeld (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• First Certification Audit
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">• 30 November – 1 December 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 17 December 2020
AUDIT SCOPE	<p>Includes the extrusion plant of Singen AS&I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Post-Casthouse <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the audit (November – December 2020), access to facilities was not possible, due to COVID-19 related travel restrictions. Those facilities were audited 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.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- ☑ 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	29 January 2021 – 28 January 2024
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	28 July 2022
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CERTIFICATE NUMBER	112
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constellium (parent company of the audited Entity "Constellium Singen GmbH") is an active ASI Member (Production and Transformation group) and it has committed to ASI's membership obligations. For further information please check the ASI website: https://aluminium-stewardship.org/about-asi/asi-members/constellium/ .
1.2 Management system	Conformance	As confirmed by document review and interviews, the Entity has established a Management System that addresses all applicable requirements of the ASI CoC Standard. It has implemented relevant policies, systems, procedures and processes. The Management System includes a robust Material Accounting System based on the Entity's Enterprise-Resource-Planning System.
1.3 Management system reviews	Conformance	The Entity has established a mechanism for the periodic review and update of the Chain of Custody Management System, in line with the other facets of its Integrated Management System.
1.4 Management representative	Conformance	On group level, the Director Group Sustainability is in charge for implementation of and compliance with ASI requirements. Within the Entity, there is one person responsible for the implementation of ASI CoC Standard per site. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has prepared and conducted Chain of Custody specific training to relevant personnel and has communicated CoC related information to all employees.
1.6 Record keeping	Conformance	The Entity has implemented procedures to maintain up-to-date records covering all applicable requirements of the Chain of Custody Standard for more than the required 5 years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are documented in a procedure. They are suitable and appear to be robust. Reporting will include Input and Output Quantities of CoC Materials over the calendar year. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include Input Percentages calculated for the calendar year. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7c Reporting to ASI (Positive Balance)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Re-Melting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in producing Casthouse Products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include quantity of ASI Aluminium allocated to ASI Credits in the calendar year. Note 1: For the time being, the Entity does not intend to use ASI market credits. Note 2: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
2 OUTSOURCING CONTRACTORS		
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.

CRITERION	RATING	COMMENT
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.

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.

CRITERION	RATING	COMMENT
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 system is designed to ensure that it is itself producing ASI Aluminium only from Facilities which are within its own ASI CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity is Certified against the ASI Performance Standard, as can be verified on the ASI website https://aluminium-stewardship.org/about-asi/asi-members/constellium/ .
6.1c Sourcing ASI Aluminium	Conformance	The Entity has defined that its Post-Casthouse Facilities shall only source ASI Aluminium from other ASI Certified Entities or via metal Traders. At the time of audit, ASI Aluminium has not yet been sourced at the Post-Casthouse Facilities.
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. This Code can be found at: https://www.constellium.com/sustainability/downloads/policies-codes-conduct . It includes an Anti-Corruption Criterion.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has communicated its Supplier Code of Conduct to suppliers of Non-CoC Material. This Code can be found at: https://www.constellium.com/sustainability/downloads/policies-codes-conduct . It includes a Responsible Sourcing Criterion.

CRITERION	RATING	COMMENT
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. This Code can be found at: https://www.constellium.com/sustainability/downloads/policies-codes-conduct . It includes a Human Rights Due Diligence Criterion.
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. This Code can be found at: https://www.constellium.com/sustainability/downloads/policies-codes-conduct . It includes a Conflict-Affected and High-Risk Areas Criterion.
7.2 Risk assessment	Conformance	The Entity has implemented procedures to assess the risks of Non-Compliance/Compliance with its Responsible Sourcing Policy of its Non-CoC Material suppliers. Due Diligence checks are performed mainly using the ECOVADIS platform. Results of risk assessments and Due Diligence checks are well documented. Corrective Actions will be requested and undertaken if the results are sub-standard.
7.3 Complaints mechanism	Conformance	The Entity has a system in place to receive and handle feedback, including complaints and grievances of Stakeholders. This mechanism is in accordance with Criterion 3.2 of the ASI Performance Standard. Main means of contact are the webpage https://www.constellium.com/contact and the E-mail address sustainability@constellium.com are disclosed in the Supplier Code of Conduct.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity's Management System includes a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based in the Entity's Enterprise-Resource-Planning System.
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 specified in writing, that the Material Accounting Period in the Entity's Material Accounting

CRITERION	RATING	COMMENT
		System is 12 months starting from the first day of the calendar year.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	For Pre-Consumer Scrap produced by the Entity, the Input Percentage of the Material Accounting Period will be used to determine the Output Quantity of Eligible Scrap. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.9 Outputs not exceed Inputs	Conformance	The Entity has implemented a procedure to check that the total output of CoC Material does not proportionally exceed the Input Percentage as applied to total input of CoC Material over the Material Accounting Period. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by the force majeure situation. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
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. At

CRITERION	RATING	COMMENT
		the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is clearly identified. At the time of the audit, no ASI CoC Material was handled by the Entity.
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. At the time of the audit, no ASI CoC Material was handled by the Entity.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of the Entity's ASI Chain of Custody related procedures, review of 'dummy' CoC Documents and interviews with personnel. The Entity will include CoC information in a separate accompanying document.
9.2a Date of issue	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes Date of Issue.
9.2b Reference number	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a reference number.
9.2c Issuing Entity	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification Number of the Issuing Entity.
9.2d Receiving customer	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification Number of the receiving Entity.

CRITERION	RATING	COMMENT
9.2e Responsible employee	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the name of the responsible employee.
9.2f Conformance statement	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g Type of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Type of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of total Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Smelting, Aluminium Re-Melting/Refining or Casthouse operations. For the time being, Constellium does not provide Entity specific sustainability information to customers. Data for the group is available from the Constellium website: https://www.constellium.com/sustainability .
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Smelting, Aluminium Re-Melting/Refining or Casthouse operations. For the time being, Constellium does not provide Entity specific sustainability information to customers and therefore does not include data related to greenhouse gas emissions in CoC Documents. Sustainability Data for the group is available from the Constellium website: https://www.constellium.com/sustainability .

CRITERION	RATING	COMMENT
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has decided to provide information about its ASI Certification Status for the ASI Performance Standard on its CoC Documents.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to include Supplementary Information on its CoC Documents.
9.5 Response to verification requests	Conformance	Relevant personnel have been trained and are aware of their duties under ASI CoC Standard. The system appears to be robust to document verification requests, errors, Corrective Actions and any potential preventive measures to meet ASI Chain of Custody Criteria.
9.6 Error management	Conformance	The Entity has defined in its ASI Management Procedure the way errors regarding CoC shipments shall 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 the ASI management Procedure how to verify the received CoC Documents and a specific checklist has been created to perform it. All deliveries are verified when entering the Facilities prior being entered in the internal SAP System. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.3 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 designed verification steps to review the consistency of received CoC Documents as required by the ASI Chain of Custody Standard. Relevant staff have been trained accordingly. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.

11 MARKET CREDITS SYSTEM: ASI CREDITS

CRITERION	RATING	COMMENT
11.1a Material Accounting System - allocation	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1c No double counting	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1d No Positive Balance of ASI Credits	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2a Date of issue	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2b Reference number	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2g Quantity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3a CoC Certification Scope - purchasing ASI Credits	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3b Material Accounting System - purchasing	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.

CRITERION	RATING	COMMENT
11.3c Expiry	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3d No re-trading	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3g Five year maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. 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.
12.1b Verifiable evidence	Conformance	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. 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.
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	29 January 2021	Issued (Full Certification)