

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# ALUPAK AG

CERTIFICATE  
NUMBER

271

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU VERITAS  
CERTIFICATION

DATE OF ISSUE

23 MAY 2023

DATE OF EXPIRY

22 MAY 2026

CERTIFIED SINCE

23 MAY 2023

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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

The alupak AG facility at Belp, Switzerland which includes the cutting, stamping and deep drawing of sealable or non-sealable aluminium capsules, containers, and forms from coated and printed aluminium foils for direct contact with food.

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	alupak AG
ENTITY NAME	alupak AG
CERTIFICATION SCOPE	The alupak AG facility at Belp, Switzerland which includes the cutting, stamping and deep drawing of sealable or non-sealable aluminium capsules, containers, and forms from coated and printed aluminium foils for direct contact with food.
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</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>• 5 – 6 December 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 7 March 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers Chain of Custody of alupak AG for cutting, Stamping and deep drawing of sealable or non-sealable aluminium capsules, containers, and forms from coated and printed aluminium foils for direct contact with food.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p>All applicable criteria in 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><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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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	23 May 2023 – 22 May 2026
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DUE DATE	22 May 2026
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CERTIFICATION NUMBER	271
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity has been an ASI member in the category of an industrial user since May 2022. <a href="https://aluminium-stewardship.org/about-asi/asi-members/alupak-ag">https://aluminium-stewardship.org/about-asi/asi-members/alupak-ag</a>
1.2 Management system	Conformance	The Entity has an integrated Management System with external certifications (e.g., ISO BRC and ISO 9.001). The Management System address all ASI requirements with additional policies and procedures, where applicable and necessary. Certificates are available at: <a href="https://www.alupak.com/unternehmen/#quality">https://www.alupak.com/unternehmen/#quality</a>
1.3 Management system reviews	Conformance	The Entity conducts periodic reviews of the effectiveness of its Management Systems. The ASI requirements are included in these reviews.
1.4 Management representative	Conformance	The Entity has appointed the CEO of alupak AG as the person with overall responsibility for the implementation of ASI.
1.5 Training	Conformance	The Entity has identified all persons that are relevant for the implementation and functioning of the ASI requirements at the company. Training has been provided for these persons, and ASI content will be included in the future annual training and in the introduction training for new staff.
1.6 Record keeping	Conformance	Based on legal requirements, the Entity has defined the document retention period as at least five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has defined that ASI Inputs and Outputs will be reported to ASI in the first three months of the following year. At the time of the initial audit, ASI Certified material was not yet in use.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has defined that the Input Percentage will be reported to ASI in the first three months of the following year. At the time of the initial audit, ASI Certified material was not yet in use.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has defined in its document "mass balance", that ASI Inputs and Outputs will be reported to ASI in the first three months of the following year, including any positive material balance, if applicable. At the time of the initial audit, ASI Certified material was not yet in use.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has defined that ASI Inputs and Outputs will be reported to ASI in the first three months of

CRITERION	RATING	COMMENT
		the following year, including any Internal Overdraw, if applicable. At the time of the initial audit, ASI Certified material was not yet in use.
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.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable, as the Entity does not use ASI Credits.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable, as the Entity does not use ASI Credits
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.
2.5 Error management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not outsource any manufacturing processes and production is fully in-house.

CRITERION	RATING	COMMENT
<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.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL</b>		
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.
<b>5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
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.

CRITERION	RATING	COMMENT
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity has implemented a system to ensure that suppliers of material for ASI Certified products have a valid ASI Certificate.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity has defined that it sources material for ASI Certified products only from suppliers that are already Certified and have a valid ASI Certificate.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has defined that it sources material for ASI Certified products only from ASI Certified suppliers and they have a valid ASI certificate. Upon delivery, the ASI required information is checked on the provided shipping documents.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity sources Aluminium predominantly from ASI Certified suppliers. It has established a supplier Code of Conduct that must be signed by its suppliers and business partners. It addresses responsible sourcing, anti-Corruption, Human Rights etc. The Code of Conduct is available at: <a href="https://www.alupak.com/alupak-verhaltenskodex">https://www.alupak.com/alupak-verhaltenskodex</a>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity sources Aluminium predominantly from ASI Certified suppliers. They have established a supplier Code of Conduct that must be signed by its suppliers and business partners. It addresses responsible sourcing, anti-Corruption, Human Rights etc. The Code of Conduct is available at: <a href="https://www.alupak.com/alupak-verhaltenskodex">https://www.alupak.com/alupak-verhaltenskodex</a>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity sources Aluminium predominantly from ASI Certified suppliers. They have established a supplier Code of Conduct that must be signed by its suppliers and business partners. It addresses responsible sourcing, anti-Corruption, Human Rights etc. The Code of Conduct is available at: <a href="https://www.alupak.com/alupak-verhaltenskodex">https://www.alupak.com/alupak-verhaltenskodex</a>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity sources Aluminium predominantly from ASI Certified suppliers. They have established a supplier Code of Conduct that must be signed by its suppliers and business partners. It addresses responsible sourcing, anti-Corruption, Human Rights etc. The Code of Conduct is available at: <a href="https://www.alupak.com/alupak-verhaltenskodex">https://www.alupak.com/alupak-verhaltenskodex</a>
7.2 Risk assessment	Conformance	The Entity sources Aluminium mainly from ASI Certified suppliers. The Entity conducts risk assessments of its main suppliers and documents the results of the risk assessments. It has a supplier

CRITERION	RATING	COMMENT
		Code of Conduct that has to be accepted and signed by its suppliers and business partners. If necessary, additional steps are taken into consideration to reduce risks.
7.3 Complaints mechanism	Minor Non-Conformance	The Entity has established a supplier Code of Conduct: <a href="https://www.alupak.com/alupak-verhaltenskodex">https://www.alupak.com/alupak-verhaltenskodex</a> The Entity communicates with the immediate superior and the head of Human Resources who are the main contacts for any concerns and complaints. However, the Entity does not have an external compliance mechanism in place, however at the time of the audit is in the process of establishing one.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has implemented an Enterprise Resource Planning (ERP) management tool. It documents all incoming Certified and Non-Certified material and outgoing products.
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 reports on an annual basis, the reporting period is the calendar year.
8.4 Input Percentage	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified Material accordingly and to calculate the Input Percentage.
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 has implemented a Material Accounting System to record Certified and Non-Certified material accordingly, using the Input Percentage to calculate the amount of eligible Output.
8.7 Output Quantity designation	Conformance	The Entity has implemented procedures and a Material Accounting System to record Certified and Non-Certified material accordingly. ASI Certified material is classified as 100% CoC Material.



CRITERION	RATING	COMMENT
8.8 Output Quantity - Pre-Consumer Scrap	Not Applicable	This Criterion is not applicable, as the Entity does not sell Pre-Consumer Scrap as Eligible Scrap.
8.9 Outputs not exceed Inputs	Conformance	The Entity has implemented procedures and a Material Accounting System to record Certified and Non-Certified material accordingly to ensure that the Output of Certified Products does not exceed the eligible amount.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified material accordingly. It defines that the Internal Overdraw must not exceed 20%.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified material accordingly. It defines that the Internal Overdraw must not exceed 20% in the case of Force Majeure.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified material accordingly. It defines that the Internal Overdraw must not exceed 20% in the case of Force Majeure and must be made up in the following period.
8.11a Positive Balance (carry over)	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified material accordingly. It defines that a Positive Balance can be carried over to the next period.
8.11b Positive Balance (expiry)	Conformance	The Entity has implemented a Material Accounting System to record Certified and Non-Certified material accordingly. It defines that a Positive Balance can be carried over to the next period but must be used in that subsequent period, as it expires within that period.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	All shipments are accompanied by the necessary documentation, identifying and describing the products. The Entity has developed a template for ASI shipments, which carries all ASI required information.
9.2a Date of issue	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information including the date of issue.
9.2b Reference number	Conformance	The Entity has developed a template for ASI shipments that carries all ASI required information including the reference number.

CRITERION	RATING	COMMENT
9.2c Issuing Entity	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information such as information on the issuing entity, the address and the CoC number.
9.2d Receiving customer	Conformance	The Entity has developed a template for ASI shipments that carries all ASI required information such as information of the receiving Entity, their address and the CoC number.
9.2e Responsible employee	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information as the name of the responsible person that can verify the information provided.
9.2f Conformance statement	Conformance	The Entity has developed a template for ASI shipments that carries all ASI required information such as the conformance statement.
9.2g Type of CoC Material	Conformance	The Entity has developed a template for ASI shipments that carries all ASI required information such as the CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information including the mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information such as the total mass in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3b Sustainability Data (passing on)	Conformance	. The Entity has developed a template for ASI shipments that carries all ASI required information and voluntary information such as Sustainability Data, if available.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has developed a template for ASI shipments, which carries all ASI required information like the certification status of the company.
9.4 Supplementary Information (optional)	Conformance	The Entity has developed a template for ASI shipments that carries all ASI required information. Currently, no supplementary data is provided.
9.5 Response to verification requests	Conformance	The Entity has established a system to handle all requests for information, quality issues etc. It was extended to cover all ASI related requirements. Clear instructions and responsibilities exist to

CRITERION	RATING	COMMENT
		respond to ASI related requests for information or verification.
9.6 Error management	Conformance	The Entity has established a Management System to handle and track all findings reported by customers etc. It is used to document, track and monitor any errors related to ASI Certified Products.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has implemented a process to verify all information on the incoming shipping documents at the warehouse. All ASI required information is checked, entered into the system and submitted to the ASI responsible manager.
10.2 Verify consistency with shipments	Conformance	The Entity has implemented a process to verify all information on the incoming shipping documents at the warehouse is consistent with the material received. All ASI CoC required information is checked before documenting it in the material Accounting System.
10.3 Verify supplier CoC Certification status	Conformance	The Entity annually updates the validity information of the certificates of its suppliers. The Chain of Custody status of suppliers is checked before the first delivery and then regularly.
10.4 Error management	Conformance	The Entity has implemented a 'Plan Do Check Act' (PDCA) system to document and follow up on any errors, quality complaints or other problems identified. This system is also used for ASI related errors. The closing of errors is evaluated in the annual management report.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Conformance	The Entity has defined with their procedures that all ASI related claims must be made in accordance with ASI requirements and have to be approved by the ASI Manager. If required, they also must be approved by the ASI secretariat.
12.1b Verifiable evidence	Conformance	The Entity has defined a procedure to regulate, that all ASI related claims must be made in accordance with ASI requirements and have to be approved by the ASI Manager. Examples were defined, and no claims are made that cannot be proved by verifiable evidence.
12.1c Employee training	Conformance	The Entity has provided training to all relevant persons on the correct process and communication of claims. The main focus of the training was that

CRITERION	RATING	COMMENT
		ASI relevant statements are coordinated through the ASI Manager.

**Document Control and Version History**

Revision	Date	Notes
0	23 May 2023	Initial Certification Audit – Full Certification