Certificate of Conformity

Certification Body:

CertMark International
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Certificate number: CM40332

THIS IS TO CERTIFY THAT

Walsc® 50mm & 75mm Light Inter-Tenancy Wall System

Type and/or use of product:

Walsc® Inter-Tenancy Wall System is used for inter-tenancy residential single storey or multi-storey loadbearing walls.

Description of product:

Walsc® 50mm & 75mm Light Inter-Tenancy Wall Systems comprises lightweight steel reinforced Autoclaved Aerated Concrete (AAC) Wall Panels

COMPLIES WITH THE FOLLOWING BCA PROVISIONS AND STATE OR TERRITORY VARIATION(S) **BCA 2019 (Amdt. 1)**

	Volume One	Volume Two	
Performance Requirement(s):	Not applicable	Not applicable	
Deemed-to-Satisfy Provision(s):	Not applicable	3.7.1.1	Fire properties for materials and construction – General concession – non-combustible materials Subject to *Limitations and conditions 2*
		3.7.3.2(a)(i)(A)	Fire protection of separating walls – Subject to *Limitations and conditions 2*
		3.8.6.2(a)(i)(ii), (b)(iii)	Sound insulation rating of walls
State or territory variation(s):	Not applicable	Part 3.8.6 (NT)	

SUBJECT TO THE FOLLOWING LIMITATIONS AND CONDITIONS AND THE PRODUCT TECHNICAL DATA IN APPENDIX A AND EVALUATION STATEMENTS IN APPENDIX B

Limitations and conditions:

1. Construction shall be in strict accordance with the Walsc Inter-Tenancy Wall System 50 - Design and Installation Guide_V.202107 & Walsc Inter-Tenancy Wall System 75 Light - Design and Installation Guide_V.2021B.
2. Compliance with FRL is dependent on the system components being as specified in A3. Any deviation from the tested specimen does not form part of this certificate of conformity
3. Where timber frames are proposed, they are to be applied where the proposed building is permitted to have timber framing in accordance with the requirements of the BCA. Also see Non-Combustibility A3.

Building classification/s:

Class 1 & 10

Richard Donarski- CMI

Don Grehan – Unrestricted Building Certifier

Date of issue: 04/08/2021

Date of expiry: 04/08/2024

4. To maintain the acoustic performance of the Walsc AAC Panel low-rise wall systems and therefore compliance with the BCA's sound insulation requirements, the following conditions must be met regarding penetrations:
   - General Purpose Outlets (GPOs) can penetrate the studwork linings on both sides but must be offset by a minimum 300mm from each other. Cables may come in contact with the studwork frame and/or Walsc AAC Panel but must not be fixed to or penetrate the Walsc AAC Panel.
   - Hydraulic services can penetrate the studwork linings on both sides in close-cut holes (max 6mm clearance) and must be sealed with non-hardening sealant. Fire-rated or acoustic-rated sealant is optional. Services must not be in contact or penetrate Walsc AAC Panel
5. The use of the certified product/system is subject to these Limitations and Conditions and must be read in conjunction with the Scope of Certification below.

Scope of certification: The CodeMark Scheme is a building product certification scheme. The rules of the Scheme are available at the ABCB website www.abcb.gov.au. This Certificate of Conformity is to confirm that the relevant requirements of the Building Code of Australia (BCA) as claimed against have been met. The responsibility for the product performance and its fitness for the intended use remain with the Certificate Holder. The certification is not transferrable to a manufacturer not listed on Appendix A of this certificate.

Only criteria as identified within this Certificate of Conformity can be used for CodeMark certification claims. Where other claims are made in a client's Installation Manual, Website or other documents that are outside the criteria on this Certificate of Conformity, such criteria cannot be used or claimed to meet the requirements of this CodeMark certification.

The NCC defines a Performance Solution as one that complies with the Performance Requirements by means other than a Deemed-to-Satisfy Solution. A Building Solution that relies on a CodeMark Certificate of Conformity that certifies a product against the Performance Requirements cannot be considered as Deemed-to-Satisfy Solution.

This Certificate of Conformity may only relate to a part of a Performance Solution. In these circumstances other evidence of suitability is needed to demonstrate that the relevant Performance Requirements have been met. The relevant provisions of the Governing Requirements in Part A of the NCC will also need to be satisfied.

This Certificate of Conformity is issued based on the evidence of compliance as detailed herein. Any deviation from the specifications contained in this Certificate of Conformity is outside of this document's scope and the installation of the certified product will not be covered by this Certificate of Conformity.

Disclaimer: The Scheme Owner, Scheme Administrator and Scheme Accreditation Body do not make any representations, warranties or guarantees, and accept no legal liability whatsoever arising from or connected to, the accuracy, reliability, currency or completeness of any material contained within this certificate; and the Scheme Owner, Scheme Administrator and Scheme Accreditation Body disclaim to the extent permitted by law, all liability (including negligence) for claims of losses, expenses, damages and costs arising as a result of the use of the product(s) referred to in this certificate.

When using the CodeMark logo in relation to or on the product/system, the Certificate Holder makes a declaration of compliance with the Scope of Certification and confirms that the product is identical to the product certified herein. In issuing this Certificate of Conformity, CertMark International has relied on the experience and expertise of external bodies (laboratories and technical experts).

Nothing in this document should be construed as a warranty or guarantee by CMI, and the only applicable warranties will be those provided by the Certificate Holder.

APPENDIX A – PRODUCT TECHNICAL DATA

A1 Type and intended use of product

Walsc® Inter-Tenancy Wall System is used for inter-tenancy residential single storey or multi-storey loadbearing walls.

A2 Description of product

Walsc® 50mm Inter-Tenancy Wall System consists of 50mm (thick) lightweight steel reinforced AAC Panels (vertically aligned or horizontally staggered) x 600mm (wide) up to 3300mm (length). Dry Density 530 kg/m^3. Refer below for system components.

Walsc® 75mm Light Inter-Tenancy Wall System consists of 75mm (thick) lightweight steel reinforced AAC Panels (vertically aligned) x 600mm (wide) up to 3300mm (length). Dry Density 450 kg/m^3. Refer below for system components.

Walsc® 50mm System Components

Product	Description
Steel I stud/C-channel	51mm x 0.55BMT (G550 grade) steel universal column and 51x50mm 0.70BMT C-channel. For horizontally aligned system only.
Aluminium Bracket	75x40x50mm with minimum thickness 1.6mm Grade 5005 Aluminium. For horizontally aligned system only.
Aluminium Bracket to AAC Panel/Timber Frame Screw	12-11x35mm type 17 hex head screw, Class III corrosion resistance (minimum) as per AS 3566.2- 2002.
Aluminium Bracket to Steel Frame/I Stud/ C-channel Screw	10-16x16mm tek screw, Class III corrosion resistance (minimum) as per AS 3566.2-2002.
Walsc® AAC Adhesive	Cement based adhesive is applied to all adjoining panel edges and can also be used to patch up minor damaged areas.
Corrosion Protection Paint	When panels are cut, the exposed ends of the reinforcement must be treated with corrosion protection paint.
Mineral Fibre	For horizontal control joints at each inter-storey junction, between top of AAC panels and roof covering and at the junction of inter-tenancy wall to external wall.
Fire Rated Sealant	At boundary wall where fire rating of the wall is required, fire rated sealant Bostik Fireban One/Firecaulk must be used in all control joints throughout the fire rated wall.

Walsc® 75mm System Components

Product	Description
Aluminium Bracket	75x40x50mm with minimum thickness 1.6mm Grade 5005 Aluminium. For discontinuous construction
Steel Top Hat	24x30mm 0.42BMT (G550 grade) steel top hat. For continuous construction.
Steel Top Hat to Structural Frame	Steel top hat is to be inserted into a steel clip which is screw fixed to the stud. Use Rondo 311D clip with steel top hat.
AAC Panel to Aluminium Bracket/Steel Top Hat Screw	14-10 type 17 hex head screw, length varies with different systems. Class III corrosion resistance (minimum) as per AS 3566.2-2002.
Aluminium Bracket/ Steel Top Hat to Timber Frame Screw	12-11x35mm type 17 hex head screw, class III corrosion resistance (minimum) as per AS 3566.2-2002.

Aluminium Bracket/Steel Top Hat to Steel Frame Screw	10-16x16mm tek screw, class III corrosion resistance (minimum) as per AS 3566.2-2002.
Walsc® AAC Adhesive	Cement based adhesive is applied to all adjoining panel edges and can also be used to patch up minor damaged areas.
Corrosion Protection Paint	When panels are cut, the exposed ends of the reinforcement must be treated with anti-corrosion protection paint.
Mineral Fibre	For horizontal control joints at each inter-storey junction, between top of AAC panels and roof covering and at the junction of inter-tenancy wall to external wall.
Fire Rated Sealant	At boundary wall where fire rating of the wall is required, fire rated sealant Bostik Fireban One/Firecaulk must be used in all control joints throughout the fire rated wall.

A3 Product specification

Fire Resistance Level (FRL) 90/90/90 for loadbearing 50mm Walsc® Inter-Tenancy wall systems

Walsc® 50mm Inter-Tenancy wall systems with vertically oriented 50mm Walsc® AAC panels with heights up to 9 m. Maximum length of a single panel must be 3000mm. Aluminium brackets must be used to connect the Walsc® panels to the timber/steel framing on either side of the wall at the floor level of each storey. An intermediate row of aluminium brackets must also be provided on either side of the wall such that the vertical spacing between two adjacent rows of brackets is not more than those specified in Table 1. These intermediate brackets must be provided on every other stud (approximately 1200mm horizontal spacing) on each side of the wall. The intermediate brackets must be staggered horizontally between the studs such that the brackets on either side do not fix to the same stud. Cavity filled with CSR Bradford Gold or Knauf Insulation Earthwool batts R1.5 glass insulation batts with a single layer of 10mm thick plasterboard. Unitex® Aero AAC adhesive. Walsc AAC Panel Aluminium bracket 50mm × 40mm × 75mm long × 1.5mm thick. Bugle batten screws 14g × 40mm long hex head T17 screws galvanised. Bracket to panel screws 14g × 40mm long hex head T17 screws galvanised. Bracket to timber/steel frame screws 12g × 35mm long hex head T17 screws galvanized for timber frame or 10g × 16mm long hex head T17 screws galvanized for steel frame. Plasterboard screws 6g × 25mm long bugle head needle point screws zinc yellow. Rondo Steel C channel. USG Boral I Stud. Timber or steel studs with a minimum depth of 70mm. Timber or steel framing must not be less than 70mm deep and the timber or steel framing must be designed by a professional structural engineer in accordance with AS 1720.1:2002 or AS/NZS 4600:2018, respectively.

Fire Resistance Level (FRL) 90/90/90 for loadbearing 50mm Walsc® Inter-Tenancy wall systems

Walsc® 50mm Inter-Tenancy wall systems with horizontally oriented 50mm Walsc® AAC panels with heights up to 9 m. Maximum length of a single panel must be 2200mm. The Walsc® AAC panels must be fixed to each timber/steel stud (600mm centres), on each side, at the floor and ceiling levels using aluminium brackets. At the two extreme ends of the inter-tenancy wall, each of the horizontally oriented Walsc® AAC panels must be fixed to the timber/steel framing with aluminium clips on each side. Additionally, the Walsc® panels must be fixed to the timber/steel studs adjacent to the intermediate I stud in a staggered arrangement. These aluminium brackets must be provided to every other AAC panel, with the clips staggered between the two sides to ensure that the brackets on either side do not fix to the same panel. Cavity filled with CSR Bradford Gold or Knauf Insulation Earthwool batts R1.5 glass insulation batts with a single layer of 10mm thick plasterboard. Unitex® Aero AAC adhesive. Walsc® AAC Panel Aluminium bracket 50mm × 40mm × 75mm long × 1.5mm thick. Bugle batten screws 14g × 40mm long hex head T17 screws galvanised. Bracket to panel screws 14g × 40mm long hex head T17 screws galvanised. Bracket to timber/steel frame screws 12g × 35mm long hex head T17 screws galvanized for timber frame or 10g × 16mm long hex head T17 screws galvanized for steel frame. Plasterboard screws 6g × 25mm long bugle head needle point screws zinc yellow. Rondo Steel C channel. USG Boral I Stud. Timber or steel studs with a minimum depth of 70mm. Timber or steel framing must not be less than 70mm deep and the timber or steel framing must be designed by a professional structural engineer in accordance with AS 1720.1:2002 or AS/NZS 4600:2018, respectively.

Fire Resistance Level (FRL) 120/120/120 for loadbearing 75mm Walsc® Inter-Tenancy wall systems

Walsc® 75mm Inter-Tenancy wall systems with vertically oriented 75mm Walsc® AAC panels with heights up to 9m. Maximum length of a single panel must be 3000mm. Aluminium brackets must be used to connect the Walsc® panels to the timber/steel framing on either side of the wall at the floor level of each storey. An intermediate row of aluminium brackets must also be provided on either side of the wall such that the vertical spacing between two adjacent rows of brackets is not more than those specified in Table 1. These intermediate brackets must be provided on every other stud (approximately 1200mm horizontal spacing) on each side of the wall. The intermediate brackets must be staggered horizontally between the studs such that the brackets on either side do not fix to the same stud. Cavity filled with CSR Bradford Gold or Knauf Insulation Earthwool batts R1.5 glass insulation batts with a single layer of 10mm thick plasterboard. Unitex® Aero AAC adhesive. Walsc® AAC Panel Aluminium bracket 50mm × 40mm × 75mm long × 1.5mm thick. Bugle batten screws 14g × 40mm long hex head T17 screws galvanised. Bracket to panel screws 14g × 40mm long hex head T17 screws galvanised. Bracket to timber/steel frame screws 12g × 35mm long hex head T17 screws galvanized for timber frame or 10g × 16mm long hex head T17 screws galvanized for steel frame. Plasterboard screws 6g × 25mm long bugle head needle point screws zinc yellow. Steel top hat. Timber or steel framing must not be less than 90mm deep and the timber or steel framing must be designed by a professional structural engineer in accordance with AS 1720.1:2002 or AS/NZS 4600:2018, respectively.

Table 1 - Maximum vertical bracket spacing for Walsc® Inter-Tenancy wall systems with vertically oriented Walsc® AAC panels

Wall height (m)	Maximum vertical bracket spacing (m)
6.0	3.0
7.0	2.7
8.0	2.5
9.0	2.3

Non-Combustibility

Component	Non-Combustibility
50mm or 75mm Walsc® AAC Panel	The 50mm and 75mm Walsc AAC panel is deemed to be non-combustible based on the materials composition
Steel top hat	This component is made from galvanized steel. The steel and galvanizing zinc is non-combustible. This component considered to be non-combustible
Shelf angle/Corner shelf angle	This component is made from galvanized steel. The steel and galvanizing zinc is non-combustible. This component considered to be non-combustible
Aluminium Bracket	This component is made from aluminium. The aluminium is non-combustible. This component considered to be non-combustible
Sealing and waterproof tape	Clause 3.7.1.1 (g) of the BCA Volume 2 allows for bonded laminated materials where: i. Each lamina, including any core, is non-combustible; and ii. Each adhesive layer does not exceed 1mm in thickness and the total thickness of the adhesive layer does not exceed 2mm; and iii. The Spread-of-Flame Index and the Smoke-Developed Index of the bonded laminated material as a whole do not exceed 0 and 3 respectively when tested in accordance with AS/NZS 1530.3:1999. Sealing and waterproof tape are suitable for use in this system provided they satisfy the above criteria.
AAC panel and top hat fixing screw	This component is made from steel or galvanized steel. The steel and galvanized zinc is non-combustible. This component considered to be non-combustible.
Plasterboard	Clause 3.7.1.1 (a) of the BCA Volume 2 allows plasterboard to be used where non-combustible material is required.
Stud frame	This component is made from galvanised steel. The steel and galvanizing zinc is non-combustible. This component considered to be non-combustible. Where timber frames are proposed, they are to be applied where the proposed building is permitted to have timber framing in accordance with the requirements of the BCA. Where applied, the FRL established by the tested wall system is considered to be consistent. This is evaluated as per Ignis advice IGNS-9201 I01 R00 dated 16/07/2021.

Walsc® AAC adhesive	This component is based on 30%-60% Portland cement. Cementitious based materials are typically non-combustible. This component is considered to be exempt from the requirements as established by the BCA volume 1.
Corrosion protection paint	In accordance with the requirements of the BCA Volume 1, Paint is exempt from the requirements of non-combustibility. Clause 3.7.1.1 of the BCA does not provide any requirements for paints on external walls.
Sealant	In accordance with the requirements of the BCA Volume 1, Sealants are exempt from the requirements of non-combustibility. Clause 3.7.1.1 of the BCA does not provide any requirements for sealants on external walls.
Mineral fibre	Mineral fibres (such as Rockwool) are considered to be non-combustible and applicable for use in external walls set by the BCA Volume 2.

Source: *Warringtonfire; Report number FAS210103 R1.2; Fire resistance performance of Walsc Inter-Tenancy wall systems; Dated 15/07/2021; Warringtonfire; Report number FRT200152 R1.0; Loadbearing wall tested to AS 1530.4:2014; Dated 22/05/2020; Warringtonfire; Report number FRT190121 R2.0; Loadbearing wall tested to AS 1530.4:2014; Dated 28/05/2019; Ignis Solutions; Report number IGNS-9172 I01 R00 – Walsc 50mm & 75mm AAC Panel Systems; Dated 16/07/2021; Ignis Solutions; Report number IGNS-9172 IO1R02 – Walsc 50mm & 75mm AAC Panel Systems; Dated 16/07/2021; CSIRO; NATA Accreditation No. 165, Report number FSV 2201; Fire-resistance test on a load bearing vertical separating element – Steel Frame; 75mm FRL 240/240/180; Dated 01/06/2021.*

Acoustics

Product	Rw	Ctr	Rw + Ctr
75mm Walsc AAC Panel Light (40.5kg/m^2)	34	-3	31
50mm Walsc AAC Panel (30kg/m^2)	33	-4	29

Discontinuous Construction – 50mm

Both Sides	**Lining Options**	min. 13mm standard plasterboard (min. 8.4kg/m^2)
	Stud Options	min. 70mm x 35mm timber studs (cc 450mm or 600mm) min. 90mm x 45mm timber studs (cc 450mm or 600mm) min. 89mm steel studs 0.75BMT (cc 450mm or 600mm)
	Insulation Options	min. 90mm glasswool 11kg (min. 11kg/m^3) min. 90mm glasswool 14kg (min. 14kg/m^3)
	Fixing	Aluminium L brackets at the periphery to achieve discontinuous construction
	Gap	min. 20mm gap between Panel and Studwork
Panel Installation		50mm Walsc AAC Panel (30kg/m^2)
Panel Configuration		Horizontally aligned or vertically aligned

Studs Both Sides	Insulation Both Sides	Lining Both Sides	R_w	$R_w + C_{tr}$
70mm timber	90mm glasswool 14kg	13mm standard plasterboard	62	50
90mm timber	90mm glasswool 11kg	13mm standard plasterboard	62	51
89mm steel	90mm glasswool 11kg	13mm standard plasterboard	62	51

Discontinuous Construction – 75mm

Both Sides	**Lining Options**	min. 13mm standard plasterboard (min. 8.4kg/m^2)
	Stud Options	min. 70mm x 35mm timber studs (cc 450mm or 600mm) min. 90mm x 45mm timber studs (cc 450mm or 600mm) min. 89mm steel studs 0.75BMT (cc 450mm or 600mm)
	Insulation Options	min. 75mm glasswool 11kg (min. 11kg/m^3) min. 75mm glasswool 14kg (min. 14kg/m^3)
	Fixing	Aluminium L brackets at the periphery to achieve discontinuous construction
	Gap	min. 20mm gap between Panel and Studwork
Panel Installation		75mm Walsc AAC Panel Light (40.5kg/m^2)
Panel Configuration		Horizontally aligned or vertically aligned

Studs Both Sides	Insulation Both Sides	Lining Both Sides	R_w	$R_w + C_{tr}$
70mm timber	75mm glasswool 14kg	13mm standard plasterboard	62	50
90mm timber	75mm glasswool 11kg	13mm standard plasterboard	63	51
89mm steel	75mm glasswool 11kg	13mm standard plasterboard	63	51

Continuous Construction – 50mm

Both Sides	**Lining Options**	min. 16mm high-density plasterboard (min 12.4kg/m^2)
	Stud Options	min. 70mm x 35mm timber studs (cc 450mm or 600mm) min. 90mm x 45mm timber studs (cc 450mm or 600mm) min. 89mm steel studs 0.75BMT (cc 450mm or 600mm)
	Insulation Options	min. 90mm glasswool 11kg (min. 11kg/m^3) min. 90mm glasswool 14kg (min. 14kg/m^3)
	Fixing	Top hats and/or brackets outside the periphery zone where required for structural stability. Does **not** achieve discontinuous construction
	Gap	min. 20mm gap between Panel and Studwork
Panel Installation		50mm Walsc AAC Panel (30kg/m^2)
Panel Configuration		Vertically staggered

Studs Both Sides	Insulation Both Sides	Lining Both Sides	R_w	$R_w + C_{tr}$
70mm timber	90mm glasswool 14kg	16mm high-density plasterboard	61	50
90mm timber	90mm glasswool 11kg	16mm high-density plasterboard	61	51
89mm steel	90mm glasswool 11kg	16mm high-density plasterboard	61	51

Continuous Construction – 75mm

Both Sides	**Lining Options**	min. 13mm high-density plasterboard (min 10.4kg/m^2) min. 16mm high-density plasterboard (min 12.4kg/m^2)
	Stud Options	min. 70mm x 35mm timber studs (cc 450mm or 600mm) min. 90mm x 45mm timber studs (cc 450mm or 600mm) min. 89mm steel studs 0.75BMT (cc 450mm or 600mm)
	Insulation Options	min. 90mm glasswool 11kg (min. 11kg/m^3) min. 90mm glasswool 14kg (min. 14kg/m^3)
	Fixing	Top hats and/or brackets outside the periphery zone where required for structural stability. Does **not** achieve discontinuous construction
	Gap	min. 20mm gap between Panel and Studwork
Panel Installation		75mm Walsc AAC Panel Light (40.5kg/m^2)
Panel Configuration		Vertically staggered

Studs Both Sides	Insulation Both Sides	Lining Both Sides	R_w	$R_w + C_{tr}$
70mm timber	75mm glasswool 14kg	13mm standard plasterboard	62	50
90mm timber	75mm glasswool 11kg	13mm standard plasterboard	63	51
89mm steel	75mm glasswool 11kg	13mm standard plasterboard	63	51

Source: *PKA Acoustic Consulting; Report number PKA101WSC R01v3; Acoustic Performance Assessment; Dated 17/06/2021.*

A4 Manufacturer and manufacturing plant(s)

This field is voluntary. Contact the Certificate Holder for details.

A5 Installation requirements

Installation must be conducted in accordance with the Walsc Inter-Tenancy wall System 50 - Design and Installation Guide_V.202107 & Walsc Inter-Tenancy wall System 75 Light - Design and Installation Guide_V.2021B.

A6 Other relevant technical data

No other relevant technical data.

APPENDIX B – EVALUATION STATEMENTS

B1 Evaluation methods

1. Fire Safety Provisions A5.2(1)(d)&(e). Reports from Accredited Testing Laboratories and a professional engineer.
2. Acoustic Provisions A5.2(1)(e). Reports from a professional engineer or other appropriately qualified person.

B2 Reports

1. Warringtonfire; Report number FAS210103 R1.2; Fire resistance performance of Walsc Inter-Tenancy wall systems; Dated 15/07/2021.
2. Warringtonfire; Report number FRT200152 R1.0; Loadbearing wall tested to AS 1530.4:2014; Dated 22/05/2020.
3. Warringtonfire; Report number FRT190121 R2.0; Loadbearing wall tested to AS 1530.4:2014; Dated 28/05/2019.
4. Ignis Solutions; Report number IGNS-9172 I01 R00 – Walsc 50mm & 75mm AAC Panel Systems; Dated 16/07/2021.
5. Ignis Solutions; Report number IGNS-9172 I01 R02 – Walsc 50mm & 75mm AAC Panel Systems; Dated 16/07/2021.
6. CSIRO; NATA Accreditation No. 165, Report number FSV 2201; Fire-resistance test on a load bearing vertical separating element – Steel Frame; 75mm FRL 240/240/180 – AS 1530.4:2014; Dated 01/06/2021
7. CSIRO; NATA Accreditation No. 165, Report number FSV 2009; Fire-resistance test on a load bearing vertical separating element – Steel Frame; 50mm FRL 120/120/120 - AS 1530.4:2014; Dated 08/07/2019.
8. PKA Acoustic Consulting; Report number PKA101WSC R01v3; Acoustic Performance Assessment; Dated 17/06/2021.

The Certificate Holder has chosen not to make the above evidence of compliance publicly available, due to the documents being considered commercial in confidence.