
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTANTIA FLEXIBLES

CERTIFICATE
NUMBER

3

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

BUREAU
VERITAS
AUSTRIA

DATE OF ISSUE

15 MAY 2018

DATE OF EXPIRY

14 MAY 2021

CERTIFIED SINCE

15 MAY 2018

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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

Constantia Teich – rolling of aluminium foil to basic
and final conversion (Weinburg, Austria).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constantia Flexibles
ENTITY NAME	Constantia Teich, Weinburg, Austria
CERTIFICATION SCOPE	<ul style="list-style-type: none">• Constantia Teich – rolling of aluminium foil to basic and final conversion (Weinburg, Austria)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation)• Other manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	Bureau Veritas Austria
AUDIT DATE	3 - 4 February 2018
AUDIT REPORT SUBMISSION	20 April 2018
AUDIT SCOPE	<p>Facilities included in the audit scope:</p> <ul style="list-style-type: none">• Constantia Teich, Weinburg, Austria <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation)• Other manufacturing or sale of products containing Aluminium <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification

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.

CERTIFICATION
PERIOD

15 May 2018 – 14 May 2021

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DATE

14 May 2021

CERTIFICATION
NUMBER

3

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The site conducts controlled self-assessments on an annual basis, which are checked by the group on the fulfillment of all legal requirements. Risk based questionnaires are used.
1.2 Anti-Corruption	Conformance	Constantia Flexibles has a well-established system to fight corruption, bribery etc. in all its forms. An anti-corruption guideline exists, employees have to participate in web-based trainings and pass exams. A global whistle-blowing hotline exists.
1.3 Code of Conduct	Conformance	Constantia Flexibles has a code of conduct both for internal and external use. It is available on the public and internal website, staff is trained every year. In the external version, a whistle blower hotline is communicated; in the internal version contact persons are also communicated.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Constantia Teich has an integrated management system for environmental, social and governance compliance. Policies exist (Code of Conduct, "Environment Policy", "Health, Safety, Security and Environment Policy" etc.), the implementation is monitored through the internal auditing system of Constantia Flexibles with self-assessment of the site Constantia Teich and additional risk-based audits, that are carried out by Constantia Flexibles.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Strong commitment of Constantia Teich management to the implementation of the management systems. The effectiveness of the system is reviewed during the annual management reviews, all strategic documents (incl. policies) have to be reviewed every three years.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are communicated externally (e.g. on the website), at the plant (e.g. on shop-floor level, TV screens etc.), all data is available to staff through the information sharepoint ("Eule")
2.2 Leadership	Conformance	Constantia Teich nominated the head of quality management as the responsible person for the implementation of the ASI standard and the compliance with the standard. The role gets support from

CRITERION	RATING	COMMENT
		Constantia Flexibles headquarters.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is ISO 14001 certified.
2.3b Environmental and Social Management Systems (social)	Conformance	Constantia Teich has social responsibility management systems implemented. It has two worker councils (for the blue-collar and white-collar workers) and was already audited twice against SEDEX/SMETA.
2.4 Responsible Sourcing	Conformance	Constantia Flexibles is highly committed to responsible sourcing (e.g. founding member of ASI and supporter of several other initiatives). It communicates its commitment in the CFlex sustainability folder. It is periodically rated by EcoVadis, participates in the Carbon Disclosure Project CDP and has a FSC Chain of Custody certification for Constantia Teich. Responsible sourcing is implemented on Constantia Flexibles and Constantia Teich level through supplier assessments and emphasizing on its suppliers to implement ASI standards.
2.5 Impact Assessments	Conformance	Constantia Teich conducts several impact assessments. The environmental impact analysis is covered by the ISO14001 Management System, the social impact is covered by the SEDEX/SMETA certification, gender analysis, health and safety assessments.
2.6 Emergency Response Plan	Conformance	Constantia Teich has excellent managed emergency response plans implanted. This includes crisis organization, communication guidelines, assessments of the insurance company, on-site fire brigades, yearly trainings.
2.7 Mergers and Acquisitions	Conformance	All mergers and acquisitions are managed by Constantia Flexibles. Group procedures are relevant for the Constantia Teich site, the due diligence process is managed and organized by Constantia Flexibles.
2.8 Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment is managed by Constantia Flexibles. Group procedures are relevant for the Constantia Teich site.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Constantia Flexibles publishes its sustainability data in the publicly available Wendel sustainability report. Constantia Flexibles and Constantia Teich provide sustainability data to platforms like EcoVadis

CRITERION	RATING	COMMENT
		and the Carbon Disclosure Project who verify and rate this data. Product specific sustainability data is provided to its clients.
3.2 Non-compliance and liabilities	Conformance	Constantia Flexibles has a well-established group system to avoid legal non-compliances and liabilities. Constantia Flexibles publishes an annual financial report that covers all sites worldwide.
3.3a Payments to governments (legal and contractual)	Conformance	Clear system of policies and procedures about anti-corruption and bribery exist at Constantia Flexibles. A detailed system of reporting and internal audit exists to guarantee compliance within the group and at the Constantia Teich site.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The main stakeholders/interested parties with their main requirements are communicated by Constantia Flexibles. Internal and external consultation mechanisms exist (e.g. workers councils, whistle blower hotlines). Detailed information is available on Constantia Flexibles website.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Constantia Flexibles provides life cycle assessment with a semi-automated approach, based on the product and product data of the relevant plant. Clients of Constantia Teich receive product specific LCAs.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Constantia Flexibles / Constantia Teich elaborate life cycle assessments for its clients and present the results in clear presentations, that cover both cradle-to-gate as well as cradle-to-grave scenarios.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Constantia Flexibles / Constantia Teich elaborate life cycle assessments for its clients that cover both cradle-to-gate as well as cradle-to-grave scenarios. Publicly available information is provided on the website, in the CSR brochure.
4.2 Product design	Conformance	Constantia Flexibles communicates clear reduction targets e.g. in its CSR brochure (-40% CO ₂ -emissions by 2023). Based on real data, Constantia Teich supplies its clients with data to different design solutions.
4.3a Aluminium Process Scrap (targets)	Conformance	Clear procedures and work instructions exist for the separate collection of aluminium scrap. Aluminium waste is a KPI that is

CRITERION	RATING	COMMENT
		strictly monitored.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Clear procedures and work instructions exist for the separate collection of aluminium foils and laminates. Aluminium waste is a KPI.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Constantia Flexibles / Constantia Teich inform its clients about the possibility to influence the recycling rate through product design and additional information on the product.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Constantia Teich has clear targets for the internal aluminium recycling. Constantia Flexibles is involved in industry-spanning project groups and initiatives like CEFLEX towards the development of a collection sorting and reprocessing infrastructure for post-consumer flexible packaging across Europe.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Conformance	Constantia Flexibles communicates its GHG emissions and energy reduction achievements in its CSR folder and the Wendel sustainability report. Constantia Teich data is communicated to public authorities and to platforms like EcoVadis and the Carbon Disclosure Project who verify and rate this data.
5.2 GHG emissions reductions	Conformance	Constantia Flexibles committed itself to reduce CO ₂ -emission by 40% by 2023. Constantia Teich monitors its energy and GHG emissions within the ISO 14.001 management system, through energy audit and submits VOC reports etc.
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	All emissions to air are measured and reported to the authorities. Emission reduction plans exist and are approved by the authorities.
6.2 Discharges to Water	Conformance	Discharges to Water is covered and managed within the Environmental management system. Water is discharged within the legal permissions. Water reduction targets are defined.

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6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Major risks are identified in environmental risk assessment. Alarm plans for different kind of risks are available and are trained. Internal audits are conducted to identify leakages. Crisis management includes environmental alarms.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Major risks are identified in environmental risk assessment. Alarm plans for different kind of risks are available and are trained. Internal audits are conducted to identify leakages. Crisis management includes environmental alarms.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Alarm plans for different kind of risks are available and are trained. Internal audits are conducted to identify leakages. Crisis management includes environmental alarms with information of authorities, local community etc. according to severity of the incident.
6.4b Reporting of Spills (regular reporting)	Conformance	Spills are reported in the environmental management system, actions are documented in the CAPA-catalogue and management review. Authorities are informed in the case of contamination issues on larger scales.
6.5a Waste management and reporting (strategy)	Conformance	Waste management is covered by the environmental management system and the waste management concept. Clear reduction targets according the collection of hazardous and non-hazardous waste exist, KPIs are defined.
6.5b Waste management and reporting (disclosure)	Conformance	Waste management reporting is covered by environmental management system and the waste management concept. Waste is a KPI that is monitored continuously.
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	Water consumption is monitored as KPI within the environmental management system. Tracking shows a continuous decrease.
7.1b Water assessment (risk assessment)	Conformance	Environmental management system covers environmental risk analysis. Water is included in the assessment, water consumption is KPI.
7.2a Water management (management plans)	Conformance	Water is included in the environmental program with a water reduction plan. Water consumption is KPI, great achievements were reached in the last years through closed water cycles.
7.2b Water management (monitoring)	Conformance	Water is a KPI that is monitored. Monitoring shows a continuous decrease of consumption.
7.3 Disclosure of water usage and risks	Conformance	Disclosure of water usage and risks is part of the environmental management system and is submitted to stakeholders on request. Water usage, waste water and water pollution are part of water monitoring and have to be reported to the authorities. Water related permits have to be renewed from time to time.

PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	Biodiversity assessment is included in the
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CRITERION	RATING	COMMENT
		environmental management system. Constantia Teich is located close to protection zones ("Natura 2000"), with special monitoring of company's impact on the environment. Constantia Teich supports local initiatives.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Several biodiversity projects were implemented but not within implemented Management systems
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Site is located close to protection zones ("Natura 2000"). All extensions at the site have to be approved through local authorities, where the impact on biodiversity and the environment is evaluated.
8.2c Biodiversity management (reporting)	Conformance	Internal (e.g. employee newsletter, internal communication) and external (e.g. local newspapers) reporting about biodiversity related issues.
8.3 Alien Species	Conformance	Projects were realized to conserve the biodiversity (e.g. fish ladder / "Fischaufstiegshilfe"). Constantia Teich is located close to protection zones ("Natura 2000"), with special monitoring of company's impact on the environment through authorities.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	Constantia Flexibles commits the whole group in its code of conduct to compliance with human rights. Constantia Teich trains all employees through an electronic training tool and had already two SMETA-audits.
9.1b Human Rights Due Diligence (process)	Conformance	Constantia Flexibles commits the whole group in its code of conduct to compliance with human rights. It is founding member of ASI and tries to extend this approach in its supply chain. Constantia Teich elaborates an annual discrimination report and had already two SMETA-audits.

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9.1c Human Rights Due Diligence (remediation)	Conformance	Constantia Flexibles commits the whole group in its code of conduct to compliance with human rights. An externally communicated helpline exists; the elected worker representation is the main contact for all complaints and topics of workers at Constantia Teich.
9.2 Women's Rights	Conformance	Constantia Flexibles commits itself in the code of conduct to the prohibition of discrimination and harassment. Constantia Teich elaborates an annual anti-discrimination report. Constantia Teich was awarded as a family friendly enterprise that sets activities to support work-life balance especially for women.
9.3 Indigenous Peoples	Conformance	Not applicable, as there are no indigenous people in Austria
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, as there are no indigenous people in Austria
9.5 Cultural and sacred heritage	Not applicable	Not applicable, as no cultural and sacred heritage is affected by the site.
9.6a Resettlements (avoid or minimise)	Not applicable	Not applicable, as no resettlement is necessary - no local residents are affected by the site.
9.6b Resettlements (where unavoidable)	Not applicable	Not applicable, as no resettlement is necessary - no local residents are affected by the site.
9.7a Local Communities (rights and interests)	Conformance	Constantia Teich is in close relationship with local communities. Stakeholders with their interests were identified and mapped as part of the ISO certification.
9.7b Local Communities (impacts)	Conformance	Constantia Teich is in close contact with surrounding communities. Most of its employees are from the local area; Constantia Teich supports several social initiatives of the local communities. Stakeholders with their interests were identified and mapped as part of the ISO certification.
9.7c Local Communities (livelihoods)	Conformance	Constantia Teich is in close contact with surrounding communities. Most of its employees are from the local area; Constantia Teich supports several social initiatives of the local communities. Stakeholders with their interests were identified and mapped as part of the ISO certification.
9.8 Conflict-Affected and High-Risk Areas	Not applicable	Not applicable, as there are no activities in high-risk areas.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	Plant security is provided through own staff. Staff is trained on the code of conduct and has to comply with it.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Constantia Teich commits itself to respect the workers' rights in its code of conduct and expects the same of its suppliers. Constantia Teich has two elected worker councils (one for blue-collar workers and one for white-collar workers).
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Constantia Teich commits itself to respect the workers' rights in its code of conduct and expects the same of its suppliers. Constantia Teich has two elected worker councils (one for blue-collar workers and one for white-collar workers).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not applicable	Not applicable, as two elected worker councils (one for blue-collar workers and one for white-collar workers) are installed at the site.
10.2a Child Labour (minimum age)	Conformance	Child labour is prohibited in Austria. Young workers (from the age of 15 to 18) are under special protection within the apprenticeship program.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Austria. Young workers (from the age of 15 to 18) are under special protection within the apprenticeship program, they are not allowed to work in hazardous working environment.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Austria. Constantia Teich commits itself - and expects its suppliers - to comply with the prohibition of child labour.
10.3a Forced Labour (human trafficking)	Conformance	Constantia Teich commits itself - and expects its suppliers - to comply with the prohibition of forced labour, slavery and human trafficking. Constantia Flexibles is a founding member of ASI.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Constantia Teich is not involved in forced labour. All employees are either employed directly or through recognized labour agencies, providing all necessary documentation of the employees.
10.3c Forced Labour (migrant workers)	Conformance	Constantia Teich is not involved in forced labour. Workers are either Austrian citizens or have permanent working and living rights in Austria.
10.3d Forced Labour (debt bondage)	Conformance	Constantia Teich is not involved in forced labour. No deposits or security payments are

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		permitted.
10.3e Forced Labour (freedom of movement)	Conformance	Constantia Teich is not involved in forced labour. There is no restriction of workers' movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Constantia Teich is not involved in forced labour. HR department does not hold original documents but only copies of ID's, passports etc. in the workers files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Constantia Teich is not involved in forced labour. The time for announced termination of the working contract is regulated in the collective bargaining agreement of the sector.
10.4 Non-Discrimination	Conformance	Constantia Teich states in its code of conduct, that discrimination is neither tolerated at the site nor at its suppliers. Constantia Teich elaborates an annual anti-discrimination report.
10.5 Communication and engagement	Conformance	Direct and frequent communication with workers and the representatives of the worker councils is established. Positive working climate and direct communication were mentioned by interviewed persons.
10.6 Disciplinary practices	Conformance	Constantia Teich states in the code of conduct, that it does not tolerate any form of punishment and harassment. It requires its suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation.
10.7a Remuneration (living wage)	Conformance	Wages are regulated through the collective bargaining agreement of the sector. Constantia Teich provides additional financial and non-financial benefits for the employees.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted at the end of the month to the employees' bank accounts.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working hours are controlled and are according Austrian worktime law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Constantia Flexibles health & safety policy is implemented and communicated together with environmental and quality policy at several places at Constantia Teich site.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Constantia Teich health & safety policy is applied to workers and visitors. Instruments

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		and institutions are implemented as foreseen by local law (H&S committee, workplace risk assessment etc.). Action plan is in place to eliminate or reduce risks.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Constantia Teich health & safety policy includes commitment to legal compliance. Systems exist to identify all applicable laws and standards and to control their fulfilment (internal and external audits).
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Constantia Teich implemented a "zero-accident-culture" program and trains employees on safe and healthy work.
11.2 OH&S Management System	Minor Non-Conformance	Constantia Teich has a well-established health & safety management system with risk assessments, audits and periodic in-depth trainings. During the audit, two minor non-conformities were identified. <ul style="list-style-type: none"> • An external truck driver used a mobile phone in an area that was marked as explosion protection zone. • The battery charging area beside the UV printing machine was not marked, inflammable material was stored there.
11.3 Employee engagement on health and safety	Conformance	Constantia Teich has a system of workers' involvement in health & safety. Worker representatives participate at the periodic work safety councils (ASA-meetings) every 3 months, a zero-accident-culture is currently implemented under workers' participation (audits, identification of unsafe situations etc.).
11.4 OH&S performance	Conformance	Health and safety incidents are tracked with the target, to reduce accidents rates by 50% per year. Near miss and dangerous actions are tracked to create awareness among the workers.