
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTANTIA TEICH (AUSTRIA)

CERTIFICATE
NUMBER

3

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

30 JULY 2021

DATE OF EXPIRY

29 JULY 2024

CERTIFIED SINCE

15 MAY 2018

EXTENSION TO

29 JULY 2021
COVID-19 POLICY

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 facility in Austria undertakes
rolling of aluminium foil to basic and final
conversion.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------|---|
| MEMBER NAME | Constantia Flexibles International GmbH |
| ENTITY NAME | Constantia Teich (Austria) |
| CERTIFICATION SCOPE | Constantia Teich facility in Austria undertakes rolling of aluminium foil to basic and final conversion. |
| 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">• Initial Certification Audit (3 – 4 February 2018)• Re-Certification Audit (30 - 31 March 2021) |
| AUDIT FIRM | Bureau Veritas Certification |
| AUDIT DATE | <ul style="list-style-type: none">• 3 - 4 February 2018 (Initial Certification Audit)• 30 – 31 March 2021 (Re-Certification Audit) |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">• 20 April 2018 (Initial Certification Audit)• 9 June 2021 (Re-Certification Audit) |
| AUDIT SCOPE | <p><u>Initial Certification Audit (3 – 4 February 2018)</u> Facilities covered in the audit scope included Constantia Teich in Weinburg, Austria. 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> <p><u>Re-Certification Audit (30 – 31 March 2021)</u> The audit scope included the rolling of aluminium foil to basic and final conversion at the Constantia Teich facility in Weinburg, Austria.</p> |

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)
- Other manufacturing or sale of products containing Aluminium

All applicable criteria in the ASI Performance Standard were included in the audit scope.

At the time of the audit (March 2021), access to the site was limited, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and on-site observations for relevant environmental and social criteria.

AUDIT
OUTCOME

- 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

30 July 2021 – 29 July 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DATE

29 July 2024

CERTIFICATION
NUMBER

3

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity conducts controlled self-assessments on an annual basis, which are checked by the Constantia Flexibles 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, including bribery, in all its forms. An anti-corruption guideline exists and 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 websites, and staff are 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 are carried out by Constantia Flexibles. |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | There is strong commitment of the Entity's management to the implementation of the management systems. The effectiveness of the system is reviewed during the annual management reviews and 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 on the website: https://www.cfex.com/sustainability At the plant (e.g. on shop-floor level, TV screens), all data is available to staff through the information sharepoint ("Eule"). |

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| 2.2 Leadership | Conformance | Constantia Teich nominated the Head of Quality Management as the responsible person for the implementation of the ASI Performance standard and compliance with the Standard. The role receives support from 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 Workers' Councils (for the blue-collar and white-collar workers) and was regularly audited 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 well managed emergency response plans implemented. These include 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 |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| | | procedures are relevant for the Constantia Teich site. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Conformance | <p>Constantia Flexibles publishes its sustainability data in the publicly available Wendel sustainability report, 'Wendel Universal Registration Document 2020', page 210ff: https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf</p> <p>Constantia Flexibles and Constantia Teich provide sustainability data to platforms like EcoVadis and the Carbon Disclosure Project who verify and rate this data. Product specific sustainability data is provided to its clients.</p> |
| 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 | A clear system of policies and procedures about anti-corruption and bribery exist at Constantia Flexibles. A detailed system of reporting and internal audits 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 | <p>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: https://www.cflex.com/contact</p> <p>Complaints can be made through the hotline: compliance.cflex@phh.at which is communicated in the Code of Conduct.</p> |
| 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. |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| 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: https://www.cflex.com/sustainability/corporate-sustainability Also, in the CSR brochure and in the Wendel sustainability report, 'Wendel Universal Registration Document 2020', page 210ff: https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf |
| 4.2 Product design | Conformance | Constantia Flexibles communicates clear reduction targets e.g. in its CSR brochure (-40% CO ₂ -emissions by 2023 and 100% of products recyclable in year 2025). Based on real data, Constantia Teich supplies its clients with data for 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 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 internal aluminium recycling. Constantia Flexibles is involved in industry-spanning project groups and initiatives e.g. CEFLEX, working towards the development of 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 on its website: |

| CRITERION | RATING | COMMENT |
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| | | <p>https://www.cflex.com/sustainability/corporate-sustainability</p> <p>Also, in the publicly available environmental report and the Wendel sustainability report, 'Wendel Universal Registration Document 2020', page 210ff:</p> <p>https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf</p> <p>Data is also communicated to public authorities and to platforms like EcoVadis and the Carbon Disclosure Project who verify and rate this data.</p> |
| 5.2 GHG emissions reductions | Conformance | <p>Constantia Flexibles committed itself to reduce CO₂-emission by 24% by 2030 and 49% by 2049. Constantia Teich monitors its energy and GHG emissions within its ISO 14001 Management System, through energy audits and submitting VOC reports. Data can be found on the website: https://www.cflex.com/sustainability/corporate-sustainability and in the Wendel sustainability report, 'Wendel Universal Registration Document 2020', page 210ff:</p> <p>https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf</p> |
| 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 and progress is monitored. |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | Major risks are identified in the 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. |

| CRITERION | RATING | COMMENT |
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| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | Major risks are identified in the 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 to authorities and the local community 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 (corrective and preventative action) 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 to the collection of hazardous and non-hazardous waste exist, KPIs are defined. |
| 6.5b Waste management and reporting (disclosure) | Conformance | The waste management reporting is covered by the environmental management system and the waste management concept. Waste is a KPI that is monitored continuously. Data is reported to the authorities and is available in the environmental report, that is given to interested parties on request. Data is provided in the Wendel sustainability report, 'Wendel Universal Registration Document 2020', page 210ff: https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf |
| 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. |

| CRITERION | RATING | COMMENT |
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| 6.6f Bauxite Residue (remediation) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 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 a KPI within the environmental management system. Tracking shows a continuous decrease. |
| 7.1b Water assessment (risk assessment) | Conformance | The environmental management system covers environmental risk analysis. Water is included in the assessment, water consumption is a KPI. |
| 7.2a Water management (management plans) | Conformance | Water is included in the environmental program with a water reduction plan. Water consumption is a KPI, with improvement reached in the last years through closed water cycles. |
| 7.2b Water management (monitoring) | Conformance | Water consumption is a KPI that is monitored. Monitoring shows a continuous decrease of water 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 are reported to the authorities. Water related permits are renewed from time to time. |

| CRITERION | RATING | COMMENT |
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| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | Biodiversity assessment is included in the environmental management system. Constantia Teich is located close to protection zones ("Natura 2000"), with special monitoring of the Entity's impact on the environment. A biodiversity consultant was contracted, several of the recommendations are currently implemented. |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | An external biodiversity assessment was undertaken and several biodiversity projects are now implemented in the environmental management system. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | Constantia Teich is located close to biodiversity 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 | Biodiversity related issues are communicated internally (e.g. employee newsletter) and externally (e.g. local newspapers). |
| 8.3 Alien Species | Conformance | A biodiversity assessment was conducted by an external consultancy. Due to the type of sourcing, the risk of introduction of alien species is low. |
| 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, including the Entity, in its Code of Conduct to compliance with human rights. Constantia Teich trains all employees through an electronic training tool on human rights and has already undertaken several SMETA-audits. |

| CRITERION | RATING | COMMENT |
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| 9.1b Human Rights Due Diligence (process) | Conformance | Constantia Flexibles commits the whole group, including the Entity, in its Code of Conduct to compliance with human rights. It is a founding member of ASI and tries to extend this approach in its supply chain. Constantia Teich elaborates an annual discrimination report and is audited on a regular basis on SEDEX/SMETA. |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | Constantia Flexibles commits the whole group, including the Entity, 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 | Not Applicable | 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 as no local residents are affected by the site. |
| 9.6b Resettlements (where unavoidable) | Not Applicable | Not applicable, as no resettlement is necessary as no local residents are affected by the site. |
| 9.7a Local Communities (rights and interests) | Conformance | Constantia Teich has a close relationship with the 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. |

| CRITERION | RATING | COMMENT |
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| 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 conflict-affected and high-risk areas. |
| 9.9 Security practice | Conformance | Plant security is provided through own staff. Staff are trained on the Code of Conduct and have 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 requests the same of its Suppliers. Constantia Teich has two elected Workers' 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 Workers' 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 Workers' Councils exist at the site (one for blue-collar workers and one for white-collar workers). |
| 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 environments. |
| 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 |

| CRITERION | RATING | COMMENT |
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| | | 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 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. The HR department does not hold original documents but only copies of documents such as identification and passports, 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 Workers' Councils is established. A 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. |

| CRITERION | RATING | COMMENT |
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| 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 to Austrian worktime law. |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | Constantia Flexibles' Health and Safety Policy is implemented and communicated together with the 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 Flexibles' Health and Safety Policy is applied to Workers and Visitors. Instruments and institutions are implemented as foreseen by local law (H&S Committee, workplace risk assessment). An 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 Flexibles' Health and 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 | Conformance | Constantia Teich has a well-established Health and Safety Management System with risk assessments, audits and periodic in-depth trainings. |
| 11.3 Employee engagement on health and safety | Conformance | Constantia Teich has a system of workers' involvement in health and 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). |
| 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. |

Document Control and Version History

| Revision | Date | Notes |
|----------|--------------|---|
| 0 | 15 May 2018 | Issued (Full Certification) |
| 1 | 8 June 2018 | Update related to minor formatting corrections. |
| 2 | 30 July 2021 | Re-Certification Audit; An extension to the Initial Certification Period (expiry date 14 May 2021) was granted due to COVID-19. |