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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# BEL GROUP SABLÉ- SUR-SARTHE PLANT

CERTIFICATE  
NUMBER

206

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

26 MAY 2022

DATE OF EXPIRY

25 MAY 2025

CERTIFIED SINCE

26 MAY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a light green background.

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)*

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CERTIFICATION SCOPE

All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).

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# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

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## OVERVIEW

MEMBER NAME	Groupe BEL
ENTITY NAME	BEL Group Sablé-sur-Sarthe plant
CERTIFICATION SCOPE	All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Material Conversion (Industrial User)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 6 – 7 April 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 11 May 2022</li></ul>
AUDIT SCOPE	<p>All aluminium-related activities at the BEL Group Sablé-sur-Sarthe plant in France, and including related material stewardship activities at Group Headquarters (France).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Material Conversion (Industrial Users)</li></ul> <p>All criteria from Principle 4 Material Stewardship in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>

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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.

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CERTIFICATION  
PERIOD

26 May 2022 – 25 May 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

25 May 2025

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CERTIFICATION  
NUMBER

206

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
1.2 Anti-Corruption	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
1.3 Code of Conduct	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.1b Environmental, Social, and Governance Policy (senior management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.2 Leadership	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.3a Environmental and Social Management Systems (environmental)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.3b Environmental and Social Management Systems (social)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.4 Responsible Sourcing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.5 Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.6 Emergency Response Plan	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.7 Mergers and Acquisitions	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
2.8 Closure, Decommissioning and Divestment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a Payments to governments (legal and contractual)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted a detailed internal study on its product lines that contain the largest proportion of aluminium, and has commissioned a series of environmental Life Cycle Assessments (LCA) on those main product lines, with the assistance of external specialist companies and collaborative tools. It is confirmed that the Entity focusses its aluminium sustainability strategy on the areas where it has the most impact.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its aluminium containing products through its public website, and has also provided a corporate email address on the webpage to respond to any additional customer request on an ad-hoc basis.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity presents its LCA information on its website in an accessible format, including underlying assumptions and system boundaries, and highlights the issues related to packaging and the four indicators on which the company focusses. This information is available at: <a href="https://www.groupe-bel.com/en/our-commitments/responsible-packaging/how-do-we-calculate-the-environmental-impact-of-our-products/">https://www.groupe-bel.com/en/our-commitments/responsible-packaging/how-do-we-calculate-the-environmental-impact-of-our-products/</a>
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process of its products to enhance sustainability. Design of packaging to avoid scrap and reducing the thickness of the aluminium foil are central principles to this endeavour and the Entity is running multiple projects to achieve this. The

CRITERION	RATING	COMMENT
		Entity provides extensive eco-design training to its team members including life cycle analysis and the concept of optimum packaging.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimises the generation of industrial aluminium waste within its own operations primarily through eco-design. Where waste is still generated, the Entity has implemented a target of directing 100% of scrap to collection, recycling and/or re-use. The Entity demonstrates sound performance on this aspect as 100% of aluminium used in Kiri® products is recycled through a dedicated scrap collection system.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Alloys are pre-sorted for recycling through the use of a suction system for the aluminium packaging, thus maximising the recovery of internal scrap.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The performance of the Entity is amongst the best in the BEL Group on aluminium recycling, BEL Group implements an extensive recycling strategy for waste management for the Group overall, with a target of zero waste to landfill, and reaching 100% of production sites with a recycling channel - this is part of BEL Group's environmental roadmap to 2025.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity has multiple engagements with local and international recycling initiatives, and actively supports efforts to increase recycling rates in the markets where it operates. This includes engaging with waste disposal companies in France to promote the use of Foucault Current machines to allow greater recovery of aluminium waste.</p> <p>The Entity is collaborating with other industrial partners on this flagship initiative ProjetMétal. The BEL Group has also created collaborations in other countries where it operates (Spain, Luxembourg, Belgium, Morocco and Vietnam) and is active within the European Aluminium Foil Association (EAFA).</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.2 Discharges to Water	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.3a Assessment and Management of Spills and Leakage (assessment)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.3b Assessment and Management of Spills and Leakage (management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.4a Reporting of Spills (immediate disclosure)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.5a Waste management and reporting (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.5b Waste management and reporting (disclosure)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.1b Water assessment (risk assessment)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.3 Disclosure of water usage and risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Alien Species	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.1b Human Rights Due Diligence (process)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.1c Human Rights Due Diligence (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.2 Women's Rights	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a Local Communities (rights and interests)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.2a Child Labour (minimum age)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.2b Child Labour (hazardous)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.2c Child Labour (worst forms)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3a Forced Labour (human trafficking)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3b Forced Labour (deposits, fees, advances)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3c Forced Labour (migrant workers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3d Forced Labour (debt bondage)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3e Forced Labour (freedom of movement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.4 Non-Discrimination	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.5 Communication and engagement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.6 Disciplinary practices	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.7a Remuneration (living wage)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.7b Remuneration (method of payment)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.8 Working Time	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2 OH&S Management System	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.3 Employee engagement on health and safety	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.4 OH&S performance	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### **Document Control and Version History**

Revision	Date	Notes
0	26 May 2022	Initial Certification Audit – Full Certification