

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Erbslöh Aluminium GmbH

CERTIFICATE  
NUMBER

255

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE  
7 FEBRUARY 2023

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

DATE OF EXPIRY  
6 FEBRUARY 2026

ASI ACCREDITED  
AUDITING FIRM

DQS CFS

CERTIFIED SINCE  
7 FEBRUARY 2023

## AUTHORISED BY

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

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

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

The development, sales, and production of aluminium profiles and embossed sheets located in Velbert and Hemer (Germany) for the industry and automotive market.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Erbslöh Aluminium GmbH
ENTITY NAME	Erbslöh Aluminium GmbH
CERTIFICATION SCOPE	The development, sales, and production of aluminium profiles and embossed sheets located in Velbert and Hemer (Germany) for the industry and automotive market.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none"><li>14 – 16 December 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>10 January 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers the development, sales, manufacturing, mechanical and surface finishing of aluminium extruded profiles for the industry market and automotive suppliers. And for the manufacturing of aluminium dession sheets in Velbert (two locations) and Hemer (one location), Germany.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 7 February 2023 – 6 February 2026

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 30 August 2024

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CERTIFICATE NUMBER 255

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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

The key processes of Erbslöh Aluminium GmbH are billet casting, extrusion, heat treatment, mechanical processing, and anodising. The automotive product range comprises extruded aluminium profiles for window trims and roof rails or extruded and functionally coated flat tubes for AC condensers, evaporators, and BEV battery cooling systems. The industry product range comprises aluminium products for furniture, appliances, consumer electronics or bicycle components.

The company employs approximately 450 people and is located in Velbert, Germany. Remote plants are located in Velbert and Hemer.

- Erbslöh Aluminium GmbH, Siebeneicker Str. 235, 42553 Velbert
- Erbslöh Aluminium GmbH, Ringstr. 29-31, 42553 Velbert
- Erbslöh Aluminium GmbH, Hönnetalstr. 291, 58675 Hemer

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	Medium	Medium
<b>RISKS</b>	Medium	Medium	Medium	Medium
<b>PERFORMANCE</b>	Medium	Medium	Medium	Medium
<b>OVERALL</b>				<b>MEDIUM</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Laws and other requirements. A register of legal and other applicable requirements within a web-based platform (Quentic) is available and up to date. The procedure 'Umwelt und Energiemanagement Rechtliche und andere Forderungen' (Environment and energy management Legal and other requirements) for regularly evaluating compliance with Applicable Law and monitoring and communicating changes in Applicable Law is available and followed.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery. The Entity has established requirements for anti-Corruption such as the Code of Conduct and the Supplier Code of Conduct. As well in the 'Arbeitsordnung' (Working Regulation) different issues are defined. In the case of issues, Stakeholders can use the contracted ombudsman or the whistleblower hotline.  Ombudsman office: <a href="https://www.wkw.de/fileadmin/content/downloads/Hinweisgebersystem_der_WKW.pdf">https://www.wkw.de/fileadmin/content/downloads/Hinweisgebersystem_der_WKW.pdf</a>  Whistleblower system: <a href="https://www.compliance-aid.com/wkw">https://www.compliance-aid.com/wkw</a>
1.3a-e Code of Conduct	Minor Non-Conformance	The Entity has implemented a Code of Conduct and Code of Conduct for Suppliers and Business Partners. The Code of Conduct refers specifically to the ASI Performance Standard and contains all necessary principles relevant to environmental, social and governance performance. Both documents are publicly available at:  <a href="https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct.pdf">https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct.pdf</a>  <a href="https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_EN/Supplier_qualification/Code_of_Conduct_Lieferanten_2021_en.PDF">https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_EN/Supplier_qualification/Code_of_Conduct_Lieferanten_2021_en.PDF</a>  The two documents are reviewed yearly during the management review and as well when significant changes occur. No indication of a control gap has been observed. The Code of Conduct for Suppliers is part of the company's contracts.  However, it was identified there is no evidence available that all Managers and Employees are trained on the Code of Conduct.
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has established and implemented several policies, all published on the Entity's website.  Occupational Health and Safety Policy: <a href="https://www.wkw.de/unternehmen/nachhaltigkeit/arbeitsschutzmanagement">https://www.wkw.de/unternehmen/nachhaltigkeit/arbeitsschutzmanagement</a>  Environmental Policy/Statement: <a href="https://www.wkw.de/unternehmen/nachhaltigkeit/umweltmanagement">https://www.wkw.de/unternehmen/nachhaltigkeit/umweltmanagement</a>

CRITERION	RATING	COMMENT
		<p>Energy Policy/Statement:  <a href="https://www.wkw.de/unternehmen/nachhaltigkeit/energiemanagement">https://www.wkw.de/unternehmen/nachhaltigkeit/energiemanagement</a></p> <p>Corporate Policy/Unternehmenspolitik:  <a href="https://www.wkw.de/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/Unternehmenspolitik_2017.pdf">https://www.wkw.de/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/Unternehmenspolitik_2017.pdf</a></p> <p>Internal communication is via information boards, intranet, notices, emails, etc. Training for employees is conducted and a review of all policies is carried out during management review at the board level, at least once a year or when significant changes occur.</p> <p>However, it was identified that the social aspects of the policies should be more detailed.</p>
2.2a-c Leadership	Conformance	<p>The responsibilities of the members of the Board of Management and the management of the Entity are outlined in the organisational charts. Policies and related communications are established and signed by management. All resources necessary for the further development and maintenance of the Management System are provided by the management of WKW.group and/or Erbslöh Aluminium GmbH. In the Code of Conduct, the Entity commits itself to compliance with ASI requirements.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented Management Systems that are certified according to ISO 14001 and ISO 50001. The certificates are available at:  <a href="https://www.wkw.de/downloads">https://www.wkw.de/downloads</a></p>
2.3b Environmental and Social Management Systems - Social	Minor Non-Conformance	<p>The Entity's social Management System is part of the Integrated Management System. It is divided into two parts, the health and safety Management System (developed according to ISO 45001) and the social Management System (developed according to international and national regulations and standards such as SA 8000).</p> <p>However, the Entity has not systematically integrated the social requirements of the ASI Performance Standard (nor SA 8000) into existing processes e.g., internal audits and management review.</p>
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Code of Conduct for Suppliers and Business Partners refers to responsible sourcing and is available at:  <a href="https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Lieferantenqualifizierung/Code_of_Conduct_Lieferanten_2021_de.PDF">https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Lieferantenqualifizierung/Code_of_Conduct_Lieferanten_2021_de.PDF</a></p> <p>Further requirements are defined in the Qualitaets_Management_Richtlinie_fuer_Lieferanten (Quality Management Guideline for Suppliers):  <a href="https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Lieferantenqualifizierung/NEU-PB_8.4.2.3-001_DEN_Qualitaets_Management_Richtlinie_fuer_Lieferanten_Qu...pdf">https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Lieferantenqualifizierung/NEU-PB_8.4.2.3-001_DEN_Qualitaets_Management_Richtlinie_fuer_Lieferanten_Qu...pdf</a>.</p> <p>The Code of Conduct for Suppliers and Business Partners is reviewed during the annual management review or when significant changes occur. Risks are evaluated within the risk management process and several general requirements are defined in the Supplier Code of Conduct. However, it was identified that these requirements are not sufficiently detailed to outline clear requirements to Suppliers.</p>

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable as the Entity currently has no New Project or Major Change to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable as the Entity currently has no New Project or Major Change to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established an Emergency Response Plan that is part of the Integrated Management System. Process description on emergency management exists. An alarm plan is based on risk analysis and environmental aspect evaluation. An overview of critical infrastructure is available. Emergency drills are conducted frequently and annual safety and fire protection instructions for all employees are conducted.</p> <p>The emergency procedure is described (e.g., in the Contractor's manual) and publicly available at:</p> <p><a href="https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Logistik/FB_8.4.3-005_Standort-Ordnung_f%C3%BCr_Fremdfirmen_-_Velbert_-_Werk_1_235.pdf">https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_DE/Logistik/FB_8.4.3-005_Standort-Ordnung_f%C3%BCr_Fremdfirmen_-_Velbert_-_Werk_1_235.pdf</a></p>
2.8a-d Suspended Operations	Conformance	The Entity has conducted an integrated internal and external topics risk analysis according to ISO 14001 and IATF including social topics. It is reviewed at least once a year during management review or based on changes. The Entity has established a procedure that defines what to do in case of suspension or when factors outside its control significantly alter operations.
2.9a-b Mergers and Acquisitions	Conformance	There are currently no mergers or acquisitions planned. Should this occur, all relevant issues will be considered as part of the Entity's Due Diligence process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity considers Environmental and social issues in the planning process for decommissioning and alterations. There are currently no plans for closure or decommissioning.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's governance approach and sustainability performance is included in the WKW.group Sustainability Report, published every second year:</p> <p><a href="https://www.wkw.de/unternehmen/nachhaltigkeit">https://www.wkw.de/unternehmen/nachhaltigkeit</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>All the Entity's Government reports, such as inspection reports, notices of violations and corrective actions, are communicated to the relevant department/area when they occur. The information is included, if applicable, within the Sustainability Report:</p> <p><a href="https://www.wkw.de/unternehmen/nachhaltigkeit">https://www.wkw.de/unternehmen/nachhaltigkeit</a></p> <p>There were no fines or judgements in 2021.</p>
3.3a-c Payments to Governments	Conformance	All information and requirements on payments to governments is available in the Code of Conduct, which applies to all employees and all activities of the Entity. No payments to governments/ political

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		<p>parties have been made. All publicly available information is in the Sustainability Report, chapter 7.3:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The WKW Group has appointed an external lawyer as an ombudswoman to combat statutory regulations violations and/or violations of internal compliance rules. The ombudswoman's office is available as a contact to whistleblowers who wish to provide confidential information about serious irregularities at the Entity and/or anyone providing information about unlawful conduct. This may be employees, customers or other third parties. The ombudswoman's office accepts all tips regarding suspected violations that are within the specified subject area.</p> <p>Information on the WKW.group's complaints resolution system can be found at:</p> <p><a href="https://www.wkw.de/unternehmen/compliance">https://www.wkw.de/unternehmen/compliance</a></p> <p>Information on the whistleblower system and Ombudswoman:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Hinweisgebersystem_der_WKW.pdf">https://www.wkw.de/fileadmin/content/downloads/Hinweisgebersystem_der_WKW.pdf</a></p> <p>To report to the Ombudswoman (Compliance Aid):</p> <p><a href="https://www.compliance-aid.com/wkw">https://www.compliance-aid.com/wkw</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has considered a life cycle perspective according to ISO 14001, which shows some aspects of a Life Cycle Assessment (LCA). Process steps are analysed and evaluated by the process owner in cooperation with health, safety and environment (HSE). However, it was identified there is no holistic environmental LCA available for major product lines for which Aluminium is considered or used.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>Upon customer request, all necessary information about the LCA and all product information may be provided. The Entity has not received a customer request for LCA information.</p>
4.2 Product Design	Conformance	<p>The overall design responsibility lies with the customer and cannot directly be influenced by the Entity. Nevertheless, the guideline of all business processes is to fulfil the WKW.group corporate goal of producing products with the lowest possible environmental impact.</p>
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	<p>The Entity minimises the generation of Aluminium Process Scrap within its operations and there is 100 % separation and collection of internal process scrap. However, it was identified there was no separation of Aluminium alloys and grades for recycling at the Hemer site.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity's products in general are recyclable and the NEWTRAL® product is completely recyclable. Within the production chain, the recyclability of the material is of particular importance. Post-industrial scrap is used in the production of billets. At the end of the life of the aluminium strips, they can be recycled in the same way as end-of-life vehicles.</p> <p>Information on the recycling strategy is available at:</p>



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		<p><a href="https://www.wkw.de/unternehmen/nachhaltigkeit/umweltmanagement">https://www.wkw.de/unternehmen/nachhaltigkeit/umweltmanagement</a></p> <p>Further information is available in the Sustainability Report, pages 4, 23 and 43:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity is a member of automotiveland.nrw, GDA (Association of the Aluminium Industry) and VDA (Association of the Automotive Industry).</p> <p>The GDA working groups are active in furthering to improve the sustainability of Aluminium. It is planned that the Entity will participate more actively in the working groups.</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity evaluates its Greenhouse Gas (GHG) emissions annually according to ISO 14064-3 and the GHG protocol. GHG emissions are externally validated, refer to the CO2 Certificate at: <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/063753_Walter_Klein_GmbH_Certificate_25-11-2021_deutsch.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/063753_Walter_Klein_GmbH_Certificate_25-11-2021_deutsch.pdf</a></p> <p>More information on GHG Emissions is included in the Sustainability Report, page 39:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a></p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has a general energy reduction target of 10% by 2030 based on 2019 figures. However, it was identified there is neither a detailed GHG Emissions Reduction Plan nor a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario.
5.4 GHG Emissions Management	Conformance	<p>Whilst the Entity has not yet detailed a GHG Emissions Reduction Plan, it has implemented a certified ISO 50001 Energy Management System, established procedures, and operating controls that will allow it to achieve GHG emissions reductions.</p> <p>The Entity has received an external verification from DQS for their Scope 1 – 3 CO<sub>2</sub>e emissions. Since January 2022 only green electricity has been used at the location in Velbert.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has appointed an emissions control officer, as is required by law. The required measurements are undertaken in accordance with

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		<p>the permits. There were no limit value exceedances in the last measurements.</p> <p>Material CO<sub>2</sub> emissions are disclosed in the Sustainability Report and the CO<sub>2</sub> Certificate. For the verified CO<sub>2</sub> Certificate, the emissions calculation considers CO<sub>2</sub>, N<sub>2</sub>O, NF<sub>3</sub>, HFCs, PCFs, and SF<sub>6</sub>:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/063753_Walter_Klein_GmbH_Certificate_25-11-2021_deutsch.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/063753_Walter_Klein_GmbH_Certificate_25-11-2021_deutsch.pdf</a></p> <p>In the 'Emissionserklärung' (emissions declaration) all material emissions are listed and published to the relevant authority: <a href="https://thru.de/daten/karte/">https://thru.de/daten/karte/</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity annually records its water statistics and has implemented continuous monitoring of water-related parameters according to Applicable Law. The Entity has implemented processes for the handling of water hazardous substances and for handling water discharges. The Entity publishes its Water data in the Sustainability Report as part of the WKW Germany data, pages 40-41:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021.pdf</a></p> <p>The Entity has ISO 14001 Certification.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has evaluated potential leakages alongside an evaluation of environmental aspects and significant cases have been defined.</p> <p>The Entity has implemented a system for dealing with leakages and a corresponding reporting system. The reports are recorded centrally in the Quentic system (EHSQ &amp; EHS Management Software System). A process plan for handling and eliminating leaks is in place. In addition, binding agents and extraction materials are available in all relevant areas.</p> <p>Incidents of spills and leakages are reviewed during management reviews as well as within the corresponding reporting chain.</p> <p>The Entity will publish its emergency management plan within the next Sustainability Report.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented procedures to ensure that in the event of environmental damage, the relevant authorities are informed immediately. As part of emergency management, the Entity's crisis team informs the authority and, if necessary, the affected population. As necessary, the wider population is informed by the Entity's communications department. In the case of Material Spills and Leakages, further information is reported in the management review or the sustainability report.</p> <p>To date, there has been no significant material spill or leakage.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established a waste management system which is part of its ISO 14001 certification. The Entity maintains an up-to-date inventory of waste streams. An annual waste report is published internally.</p> <p>The waste separation is done according to a Waste Mitigation Hierarchy. Also, a detailed overview of the different aluminium alloys is available. The Entity follows a 5-step hierarchy.</p>

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		More information is available in the Sustainability Report, chapter 5.4: <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity's Dross is stored safely on site. The Entity keeps scrap statistics which are documented in the annual waste report. Dross is sent for external recycling by an external service provider. No Dross is sent to landfill.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water withdrawal is broken down by source (e.g., well water and city water) The Entity carries out a monthly evaluation of the water withdrawal and keeps water statistics. Monitoring of water-related parameters is according to Applicable Law.</p> <p>The Entity has implemented a process for handling water hazardous substances and water discharges, this includes what to do in case of emergency and who to inform.</p> <p>More information is available in the Sustainability Report, chapter 5.3: <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a></p> <p>The German sites of WKW.group are not located within water protection or nature conservation areas.</p>
7.2a-e Water Management	Conformance	<p>The Entity's Water management activities are defined and coordinated in cooperation with the authority and are then carried out within the framework of the corresponding water withdrawal permits.</p> <p>Water conservation concepts are processed within the Entity and implemented in accordance with the defined objectives. The overall objective is defined and published.</p> <p>More information is available in the Sustainability Report, chapter 5.3: <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a></p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>In the case of new construction projects and approval procedures, the conditions are reviewed and evaluated in accordance with the project as part of the preliminary Environmental Impact Assessment (Umweltverträglichkeitsprüfung). As part of the risk assessment environmental impacts are evaluated.</p> <p>However, it was identified for situations where the Entity contributes to, or is likely to impact Ecosystem Services, a systematic review is yet to be undertaken.</p>
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	In the case of new construction projects and approval procedures, the conditions are reviewed and evaluated in accordance with the project

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		<p>as part of the preliminary Environmental Impact Assessment. Because the analysis of biodiversity is not significant, no action plan is necessary, nevertheless activities are ongoing.</p> <p>However, the Entity will reassess this requirement in future following a specific systematic review on Priority Ecosystem Services.</p>
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity has identified the inherent risk to biodiversity as very low. Nevertheless, management activities are ongoing, including support of "Waldlokal" ( <a href="http://www.waldlokal.com">www.waldlokal.com</a> ), a tree planting project where employees can help with planting the trees.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>This Criterion is not applicable, as the biodiversity assessment did not identify any Priority Ecosystem Services. Currently, no changes to permits or construction projects are planned. The existing properties are located in long-standing industrial areas.</p> <p>However, the Entity will reassess this requirement in future following a specific systematic review on Priority Ecosystem Services.</p>
8.4 Alien Species	Conformance	The Entity has detected that only wooden pallets have potential impacts, but are not critical, because they are treated.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	Currently, the Entity does not have new construction projects planned. The existing properties are in long-standing industrial areas. In the context of new construction projects, the environmental relevance is assessed in an environmental compatibility pre-audit and implemented accordingly. Biodiversity is also taken into account in this process. The premises are not located in nature reserves or water protection areas. No World Heritage Properties are affected or located at the production sites. A commitment is defined in the Supplier Code of Conduct under 'Geopolitical neutrality'.
8.6a-d Protected Areas	Conformance	Currently, the Entity does not have changes to permits or construction projects planned. The existing properties are located in long-standing industrial areas. In the context of new construction projects, the environmental relevance is assessed in an environmental compatibility pre-audit and implemented accordingly. Biodiversity is also taken into account in this process. The premises are not located in nature reserves or water protection areas. Impact Assessments must be made before significant changes can be made, the last ones were carried out for Velbert (23.04.2020) and for Hemer (June 2016).
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	The Entity has considered Human Rights issues in its Management System. Different aspects are integrated into the Management Manual (e.g., Stakeholder analysis, targets, Human Rights risks). The first steps for a Human Rights Due Diligence process have commenced, however this is not to the extent necessary, based on UN Guiding principles.

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has different activities ongoing which promote gender equity and women's empowerment (e.g., job postings, and training opportunities for young professionals). However, the Entity has not documented and published a detailed program.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the rights of Indigenous Peoples are included in the Code of Conduct and Supplier Code of Conduct.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion of not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence. present. And no Indigenous Peoples are present within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as the Entity does not have projects that require relocation or transfer.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has conducted Stakeholder analyses (neighbourhood) to identify related aspects e.g., concerning noise (noise measurements have been made), complaints of neighbours (no complaints in the last years).</p> <p>The Entity's social commitment is expressed through, among other means, sustained donation activities. More information is available in the Sustainability Report, page 73:</p> <p><a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Na chhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Na chhaltigkeitsbericht_2021_.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established Management Systems, including a Code of Conduct and a Supplier Code of Conduct where responsibilities are defined, resources are available and information gathering is ongoing. The Supplier Code of Conduct is part of the contracts with suppliers and covers Human Rights, Indigenous People and Local Communities, geopolitical neutrality, and conflict minerals.

CRITERION	RATING	COMMENT
		Code of Conduct: <a href="https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct_2-2021.pdf">https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct_2-2021.pdf</a>  Supplier Code of Conduct: <a href="https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_EN/Supplier_qualification/Code_of_Conduct_Lieferanten_2021_en.PDF">https://www.wkw.de/fileadmin/content/Einkauf/Zertifikate_EN/Supplier_qualification/Code_of_Conduct_Lieferanten_2021_en.PDF</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity has established the Risk Management Excel File where significant risks and corrective actions are to be defined in case of a red rating. However, the Entity has not conducted a risk-based Due Diligence exercise over its aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	The Criterion is not applicable as the Entity did not identify any actual or potential risks. However, the Entity will reassess this requirement in future following the risk-based Due Diligence, and further steps will be defined if significant issues are evident.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices are audited as part of the ASI Performance Standard Certification. The Entity is considering the London Metal Exchange (LME) Responsible Sourcing Rules for its supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The 2022 Sustainability Report will be published on the WKW.group webpage and covers different aspects in respect to Human Rights and risk in the supply chain.
9.9 Security practice	Conformance	The Code of Conduct for Contractors is in place and valid for the service provider company which also has its own Code of Conduct. The personnel are integrated into the Entity's Management System. The team leader from the external service provider was trained and has further trained their employees. This was verified through an interview with the individual who was aware of the Code of Conduct.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to form or join Labour Unions or other Associations for Collective Bargaining, which is organised under German Law. Worker representatives are elected. This was verified through an interview with one Worker representative who confirmed the commitment and good relationship between the Entity and the Workers' committee. The Trade Union (IG Metall) present at the Entity has agreed on the Collective Bargaining agreement.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity is located in Germany where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity does neither use nor support the use of Child Labour and there is Applicable Law in Germany. A commitment is made in the Code of Conduct and as part of the employment procedure.

CRITERION	RATING	COMMENT
		The youngest employees are 16 years and older (Only for apprenticeships, which are valid for 16 and 17 years old).
10.3a-c Forced Labour	Conformance	<p>The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking, either directly or through any employment or recruitment agencies. This was verified through a site tour, interviews, and document review.</p> <p>More information is available in the Code of Conduct, chapter 3.2: <a href="https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct_2-2021.pdf">https://www.wkw.de/fileadmin/content/downloads/Code_of_Conduct_2-2021.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities and does not engage in or support Discrimination (e.g., in job postings). Remuneration is based on an official collective agreement on remuneration levels. Job profiles for all jobs are available.</p> <p>The AGG (Allgemeines Gleichbehandlungs-Gesetz) (General Equal Treatment Act) is known and considered at the Entity.</p> <p>The Entity drives the 'Young professionals'-program (which promotes young professionals' growth). The percentage of women in this program is the same as the percentage of women in the Entity, which gives evidence that women are supported in the same way as men.</p>
10.5 Communication and engagement	Conformance	The Entity has open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues. There is frequent communication and an open-door policy between Workers, Worker representatives and management. On blackboards and the staff information portal, and on monitors with frequently changing information, different kinds of communication are evident.
10.6a-g Violence and Harassment	Conformance	The Entity has established a workplace Policy on Violence and Harassment in consultation with Workers and their representatives. The Code of Conduct and the Arbeitsordnung (work rules) statements are defined.
10.7a-c Remuneration	Conformance	All wages are regulated through the Collective Bargaining agreement of the metal sector according to the ERA (Entgeltrahmenvertrag) (Remuneration framework of the trade union). There is no differentiation between men and women. All staff are under the Collective Bargaining Agreement which ensures that no payment is withheld and that all payments are made monthly.
10.8a-c Working Time	Conformance	The Entity is aware of and complies with Applicable Law, industry standards and Collective Bargaining agreement on Working Time (including Overtime working hours), public holidays and paid annual leave.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights in several different ways such as through blackboards or info portals in the intranet and directly via the Workers' council and their meetings. Also, relevant laws are published in the employee intranet portal.

CRITERION	RATING	COMMENT
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established a Health and Safety Management System according to ISO 45001 which is an integral part of the HSE Management System. The Entity has implemented an Environmental Policy and a Health and Safety Policy. The Entity's health and safety targets are defined and tracked. Health and safety are covered in the yearly management review. Health and Safety Committee meetings take place frequently. The Entity conducts an internal audit where safety aspects are considered.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's Health and Safety Management System is reviewed at least once a year during the integrated management review or as required due to changes. In addition to Health and Safety Committee meetings, internal audit reviews take place.  More information is available in the Sustainability Report, chapter 6.8: <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021_.pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	Health and Safety Committee meetings are held four times a year where Workers can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management. The Worker's council was elected and represents the Workers in Health and Safety issues. There are different means for the Workers to raise concerns e.g., via the ombudswoman, via the medical doctor or directly via their managers.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 February 2022	Initial Certification Audit – Full Certification