ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Constantia Teich (Austria)

CERTIFICATE NUMBER

2

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

30 JULY 2024

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

29 JULY 2027

ASI ACCREDITED AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

CERTIFIED SINCE

15 MAY 2018

AUTHORISED BY

The

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia 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

CERTIFICATION SCOPE

The production of rolling of Aluminium foil to basic and final conversion at Constantia Teich facility in Austria.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

| MEMBER NAME | Constantia Flexibles International GmbH |
|----------------------------|---|
| ENTITY NAME | Constantia Teich (Austria) |
| CERTIFICATION SCOPE | The production of rolling of Aluminium foil to basic and final conversion at Constantia Teich facility in Austria. |
| SUPPLY CHAIN ACTIVITIES | Semi-Fabrication Material Conversion Other manufacturing or sale of products containing Aluminium |
| ASI STANDARD | Performance Standard V3 |
| AUDIT TYPE | Initial Certification Audit (3 – 4 February 2018) Re-Certification Audit (30 - 31 March 2021) Re-Certification Audit and Scope Change (10 – 12 June 2024) |
| AUDIT FIRM | Bureau Veritas Certification |
| AUDIT DATE | 3 - 4 February 2018 (Initial Certification Audit) 30 - 31 March 2021 (Re-Certification Audit) 10 - 12 June 2024 (Re-Certification Audit and Scope Change) |
| AUDIT REPORT SUBMISSION | 20 April 2018 (Initial Certification Audit) 9 June 2021 (Re-Certification Audit) 15 July 2024 (Re-Certification Audit and Scope Change) |
| AUDIT SCOPE | Initial Certification Audit (3 – 4 February 2018) Facilities covered in the Audit Scope included Constantia Teich in Weinburg, Austria. 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 |
| | Re-Certification Audit (30 – 31 March 2021) The Audit Scope included the rolling of Aluminium foil to basic and final conversion at the Constantia Teich facility in Weinburg, Austria. 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.

Re-Certification Audit and Scope Change (10 - 12 June 2024)

The Audit Scope included the rolling of Aluminium foil to basic and final conversion at the Constantia Teich facility in Weinburg, Austria.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion
- Other manufacturing or sale of products containing Aluminium

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

| 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 2024 – 29 July 2027 | | | |
| NEXT AUDIT TYPE | Re-Certification Audit | | | |
| NEXT AUDIT DATE | 29 July 2027 | | | |
| CERTIFICATE NUMBER | 3 | | | |



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.

ENTITY OVERVIEW

Constantia Teich Austria commenced operation in 1912-Company Foundation (family-based Austrian Company). Constantia Teich is the largest company within the European flexible packaging industry and has the highest sales of the Constantia Flexibles Group. Constantia Teich is the largest employer in the region (Pielach Valley in Lower Austria, about 60 km west of Vienna) and is number one in the world in lid production. In 2023, the plant produced 1.0 billion m² of Aluminium foils, 65,600 tons of packaging foils, 12.3 billion die-cut lids, and 1.2 billion deep-drawn containers.

The site employs 1,011 Workers (including employees and Contractors) and features 144 manufacturing lines for various processes like rolling Aluminum foil, lacquering, laminating, printing, extrusion coating, slitting, embossing, deep-drawing, and die-cutting. It has the only rolling mill within the Group and supplies Aluminium foil (input stock) to the market as well as Group companies. They cover the entire value creation chain for internal production of flexible packaging materials for food and beverage and pharmaceutical industries – from the rolling and printing to final production.

The ancillary infrastructure includes a 25,500 m² car parking lot and a water-driven energy plant. Construction activities are continuing on-site to increase capacity. The nearest sensitive receptors are the Pielach River in the Natura 2000 area and a rural environment with three neighbouring farmers.

The customer distribution includes more than 370 customers: 85% in the European market, 11% in the American market, and 4% across Asia, Africa, and Australia.

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 |
|-------------|------------|-------------|--------|-----------------|
| SYSTEMS | High | High | High | HIGH |
| RISKS | High | High | High | HIGH |
| PERFORMANCE | High | High | High | HIGH |
| OVERALL | | HIG | ÷H | |

FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| 1. BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity annually conducts controlled self-assessments, which are assessed by the Constantia Flexibles Group to ensure that it fulfils all legal requirements. Risk-based questionnaires are used. |
| 1.2 Anti-Corruption | Conformance | The Entity has a well-established system to eliminate Corruption, including Bribery, in all its forms. An anti-Corruption guideline exists, and employees must participate in web-based training and pass exams. A global whistleblowing hotline has been established. |
| 1.3a-e Code of Conduct | Conformance | The Entity has implemented a Code of Conduct for internal and external use. It is available on both the public and internal websites, and staff are trained annually. In the external version, a whistleblower hotline is communicated and in the internal version, contact persons are also communicated. |
| | | The Code Of Conduct and Code of Conduct for Suppliers are available at: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 2. POLICY AND MANAGEMEN | т | |
| 2.1a-f Environmental, Social, and Governance Policy | Conformance | The Entity has implemented an integrated Management System for environmental, social and governance compliance. Policies exist (including the Code of Conduct, Environment Policy and the Health, Safety, Security and Environment Policy) and their implementation is monitored through the internal auditing system of Constantia Flexibles headquarters with a self-assessment of the site Constantia Teich and additional risk-based audits undertaken by Constantia Flexibles. |
| | | There is a firm management commitment 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. Policies are communicated externally on the website (https://www.cflex.com/sustainability), at the plant (e.g. on the 'shopfloor' level and via monitors throughout the site), and all data are available to staff through the information SharePoint (Eule). |
| 2.2a-c Leadership | Conformance | The Entity has nominated the Head of Quality Management as the responsible person for the implementation of the ASI Performance Standard and ongoing conformance with the Standard. This position receives support from Constantia Flexibles headquarters. |
| 2.3a Environmental and Social Management Systems - Environmental | Conformance | The Entity has implemented an Environmental Management System that is ISO 14001 certified. |
| 2.3b Environmental and Social Management Systems - Social | Conformance | The Entity has implemented Social Responsibility Management Systems. It has implemented two Workers' Councils (for the blue-collar and white-collar Workers) and is regularly audited against SEDEX/SMETA. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 2.4a-e Responsible Sourcing | Conformance | The Entity is highly committed to responsible sourcing (e.g. a founding member of ASI and supporter of several other initiatives). It communicates its commitment in the CFlex sustainability folder (EcoVadis evaluation, Carbon Disclosure Project, other certification, Code of Conduct for Suppliers etc). It is periodically rated by EcoVadis, participates in the Carbon Disclosure Project CDP and has an FSC Chain of Custody certification. Responsible sourcing is implemented at the Constantia Flexibles headquarters and the Entity level through supplier assessments and emphasising its suppliers to implement the ASI Standards. The Ethical Sourcing document is available publicly for external Stakeholders at: https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&tx_dwboilerplate_cflex%5Bfile%5D=1515&cHash=2fc052d57lf246766aaf7930426dc245 |
| 2.5a-g Environmental and Social Impact Assessments | Not Applicable | This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities. However, the Entity conducts several Impact Assessments. Environmental Impact Assessment is covered by the ISO14001 Management System, social impact by SEDEX/SMETA certification, |
| | | gender analysis and health and safety assessments. More information is available in the Environmental program: https://www.cflex.com/sustainability/corporate-sustainability |
| 2.6a-h Human Rights Impact Assessment | Not Applicable | This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities. However, the Entity conducts several Impact Assessments. Environmental Impact Assessment is covered by the ISO14001 Management System, social impact by SEDEX/SMETA certification, gender analysis and health and safety assessments. More information is available in the Environmental program: https://www.cflex.com/sustainability/corporate-sustainability |
| 2.7a-f Emergency Response Plan | Conformance | The Entity has established emergency response plans. These include crisis organisation, communication guidelines, assessments of the insurance company, on-site fire brigades, and annual training. The emergency response plans are available on request. |
| 2.8a-d Suspended Operations | Conformance | The Entity has a Business Resilience plan in place. The Risk Manager conducts a holistic risk evaluation twice a year. Senior Management reviews the results of the risk evaluation and operational responses. |
| 2.9a-b Mergers and Acquisitions | Conformance | Constantia Flexibles manages all mergers and acquisitions and the Due Diligence process. The group procedures are applied to the Entity when Mergers and Acquisitions occur. |
| 2.10a-b Closure, Decommissioning and Divestment | Conformance | Constantia Flexibles manages all closures, decommissioning and divestment. The group procedures are applied to the Entity when Closure, Decommissioning and Divestment occur. |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| 3. TRANSPARENCY | | |
| 3.1a-b Sustainability Reporting | Conformance | The Entity publishes its Sustainability Data in the publicly available Wendel Group Sustainability Report, 'Wendel Universal Registration Document 2022', page 214: https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf |
| | | Additional Sustainability Data is provided to platforms like EcoVadis and the Carbon Disclosure Project who verify and rate these data. Product specific Sustainability Data is provided to its clients. More information is included in the ESG Report 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| 3.2 Non-compliance and Liabilities | Conformance | The Entity has a well-established group system to avoid legal non-compliances and liabilities. A group annual ESG report covers all sites worldwide: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| 3.3a-c Payments to Governments | Conformance | The Entity has a system of Policies and procedures on anti-Corruption and Bribery. A detailed system of reporting and internal audits exists to ensure compliance both within the Group and Entity site. |
| | | The Code of Conduct and Code of Conduct for Suppliers and Subcontractors are available at: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | Internal and external consultation mechanisms exist (e.g. Workers' Councils, whistleblower hotlines) for main Stakeholders and interested parties. Detailed information is available in the Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 4. MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment | Conformance | The Entity has developed a Life Cycle Assessment (LCA) with a semi- automated approach, based on the Product and Product data of the relevant plant. Clients of the Entity receive Product specific LCAs. |
| 4.1b-c Environmental Life Cycle Assessment - Disclosure | Conformance | The Entity produces LCA for its clients and presents the results that cover both 'cradle-to-gate' as well as 'cradle-to-grave' scenarios. The publicly available information is available at: https://www.cflex.com/sustainability/corporate-sustainability |
| | | LCA information is also available on both the CSR brochure and the Wendel Sustainability Report, 'Wendel Universal Registration Document 2020', page 210: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| 4.2 Product Design | Conformance | The Entity supplies its clients with data for different design solutions such as Material downgauging, alternative and new product specifications, high solid lacquers, innovative specifications offering |

| CRITERION | RATING | COMMENT |
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| | | benefits downstream, continuous research and development (R&D) and initiatives to increase End of Life recycling. |
| 4.3a-b Aluminium Process Scrap | Conformance | The Entity has established clear procedures and work instructions for the separation and collection of Aluminium scrap. Aluminium waste is a key performance information that is routinely monitored by the Entity. Aluminium foils and laminates, are separated according to their grade. |
| 4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing | Conformance | The Entity inform its clients on the potential for influencing the recycling rate through product design and additional information on the product. The Entity has a transformation target where 100% of its packaging solutions are designed for recycling by 2025. The Recycling Strategy is available in the ESG Report 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| 4.4d Collection and Recycling of Products at End of Life | Conformance | The Entity has clear targets for internal Aluminium recycling. The Entity is involved in industry-wide project groups and initiatives such as Circular Economy for Flexible Packaging (CEFLEX) and is working towards the development of collection sorting and reprocessing infrastructure for post-consumer flexible packaging across Europe. The Entity participates in the Austrian system for a Circular Economy ("Kreislaufwirtschaft"). |
| 5. GREENHOUSE GAS EMISSION | ONS | |
| 5.1a-b Disclosure of GHG Emissions and Energy Use | Conformance | Greenhouse Gases (GHG) Emissions Scopes 1, 2 and 3 in the publicly available environmental report and the Wendel Sustainability Report (page 215) and ESG Report 2023 (pages 30-32): |
| | | Wendel Sustainability Report, 'Wendel Universal Registration Document 2022: https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf ESG Report 2023: |
| | | https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| | | Data is also communicated to public authorities and to platforms including EcoVadis and the Carbon Disclosure Project who also verify and rate these data. |
| 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. |

| CRITERION | RATING | COMMENT |
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| 5.3a-e GHG Emissions Reduction Plans | Conformance | The Entity has committed to the reduction of CO ₂ emissions by 24% by 2030 and 49% by 2049. The Entity monitors energy and GHG emissions within its ISO 14001 Management System through energy audits and submitting VOC reports. The data are available at: https://www.cflex.com/sustainability/corporate-sustainability The reduction plan and pathway is available within the ESG Report 2023, pages 30-34: |
| | | https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| | | The Entity demonstrated the GHG Emissions Reduction Pathway is consistent with a 1.5 ^C warming scenario, using the ASI Entity Pathway Calculation Tool. |
| 5.4 GHG Emissions Management | Conformance | The Entity has implemented a corporate value chain accounting system for Scope 1, 2 and 3 emissions according to the GHG Protocol, which is externally verified annually. Analysis and reduction targets for emissions and programmes are part of the environmental management programme of the ISO 14001:2015 certification. The GHG Management System is integrated as part of the Environmental Management System. |
| 6. EMISSIONS, EFFLUENTS AN | D WASTE | |
| 6.1a-f Emissions to Air | Conformance | All Emissions to air are measured according to legal requirements and are reported to the authorities. The relevant authorities approve emission reduction plans. |
| | | More information on air emissions are included in the ESG Report CFlex 2023, pages 35: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/ConstantiaFlexibles_ESG_Report_2023.pdf |
| 6.2a-g Discharges to Water | Conformance | Discharges to Water are 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-g Assessment and Management of Spills and Leakages | Conformance | Major risks have been identified in the environmental risk assessment. Emergency action plans for different types of risks are in place, and employees receive training on these plans. Internal audits are conducted to identify any Leakages, and crisis management includes environmental alarms. |
| 6.4a-b Public Disclosure of Spills and Leakages | Conformance | Emergency action plans are available for various risks. Crisis management involves environmental alarms that provide information to authorities and the Local Community based on the severity of the incident. Spills are reported in the Environmental Management System, and actions are documented in the CAPA-catalogue (corrective and preventative action) as well as part of the management review. Contamination incidents on a larger scale are reported to the authorities if and as required. |

| CRITERION | RATING | COMMENT |
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| 6.5a-c Waste Management and Reporting | Conformance | Waste management is addressed under the Environmental Management System and includes clear reduction targets for both Hazardous and Non-Hazardous Waste, and KPIs have been defined. Waste management reporting is included in the Environmental Management System and waste management concept. Monitoring of waste as a KPI is continuous, and data is reported to the authorities and is available in the environmental report. Hazardous and Non-Hazardous Waste sent for recovery is reported to |
| | | the authorities and made available in the ESG Report 2023, page 36: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf |
| | | ESG Report CFlex 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/ConstantiaFlexibles_ESG_Report_2023.pdf |
| 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 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 7. WATER STEWARDSHIP | | |
| 7.1a-b Water Assessment and Disclosure | Minor Non- Conformance | The Entity monitors its water consumption as a key performance indicator (KPI) within its Environmental Management System, which also includes environmental risk analysis. The risks to Watersheds are rated as low, and monitoring has confirmed a continuous decrease in consumption. Water consumption has been implemented as a KPI, and improvements have been made in recent years through the use of closed water cycles. |
| | | The document containing this information is available on the internal SharePoint ("öffentliche Dokumente") and can be provided upon external request. However, data regarding water consumption and withdrawal is currently not publicly disclosed. |
| 7.2a-e Water Management | Not Applicable | This Criterion is not applicable, as water-related risks are identified as low within the environmental program. |
| 8. BIODIVERSITY AND ECOSY | STEM SERVICES | |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment | Conformance | The Entity has conducted a biodiversity assessment which is incorporated in the Environmental Management System. The Entity is located close to protection zones (Natura 2000), with monitoring of their impact on the environment undertaken by the Entity via the use of a biodiversity consultancy. Several of the recommendations provided by the consultancy have been currently implemented, however the impact has been assessed as low. |
| 8.1b Biodiversity and Ecosystem Services Risk | Not Applicable | This Criterion is not applicable to the Entity as the Biodiversity assessment determined the Entity's impact as low. Additionally, there |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| and Impact Assessment - Priority | | was no observation made during the Audit that the Entity's impact on Ecosystem Services in its Area of Influence would be Material. |
| 8.2a-g Biodiversity Management | Not Applicable | This Criterion is not applicable to the Entity as the Biodiversity assessment determined the Entity's impact as low. |
| | | However, the Entity has conducted a biodiversity assessment which is incorporated in the Environmental Management System. The Entity is located close to protection zones (Natura 2000), with monitoring of their impact on the environment undertaken by the Entity via the use of a biodiversity consultancy. Several of the recommendations provided by the consultancy have been currently implemented, however the impact has been assessed as low |
| 8.3a-c Management of Priority Ecosystem Services | Not Applicable | This Criterion is not applicable, as no Priority Ecosystem Services impacts have been identified. |
| 8.4 Alien Species | Conformance | A Biodiversity assessment has been conducted by an external consultancy and determined that the risk of introduction of Alien Species onto site is low, based on the Entity's current sourcing processes. |
| 8.5a-b Commitment to "No Go" in World Heritage Properties | Not Applicable | This Criterion is not applicable, as the Entity has confirmed it is not in proximity to any World Heritage Properties. |
| 8.6a-d Protected Areas | Conformance | The Entity has identified and agreed on the Natura 2000. All regulations concerning those areas are fulfilled. Documentation such as risk assessment and emergency response plans are available on internal SharePoint (öffentliche Dokumente) and are also made available to interested parties. |
| 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. |
| 9. HUMAN RIGHTS | | |
| 9.1a-d Human Rights Due Diligence | Conformance | The Entity is committed to respecting Human Rights in its Code of Conduct. It is a founding member of ASI and aims to apply this approach to its supply chain. The Entity publishes an Annual Discrimination Report, has established an anonymous whistle-blowing hotline, and undergoes regular audits on SEDEX/SMETA addressing labour, health and safety, environmental performance, and ethics within the supply chain. Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 9.2a-e Gender Equity and Women's Empowerment | Conformance | In the Code of Conduct, the Entity prohibits Discrimination and Harassment. Equal opportunity is considered as an integral part of the human resources strategy. The Entity produces an annual anti-Discrimination report. The Entity is recognised as a family-friendly company with activities to support work-life balance, especially for women. |

| CRITERION | RATING | COMMENT |
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| | | Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| | | For more information, refer to the ESG Report 2023, pages 20 and 45-47: |
| | | https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles_ESG_Report_2023.pdf |
| 9.3a-i Indigenous Peoples | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources within Austria. |
| 9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources within Austria. |
| 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 to the Entity, as there are no Indigenous Peoples, lands, territories or resources within Austria. |
| 9.5a Cultural and Sacred Heritage - Identification | Not Applicable | This Criterion is not applicable to the Entity, as there are no cultural and sacred heritage features within the Entity's Area of Influence, and is confirmed via the UNESCO website: https://www.unesco.at/en/culture/world-heritage/world-heritage-sites-in-austria |
| 9.5b Cultural and Sacred Heritage - Impacts | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, lands, territories or resources in Austria. |
| 9.6a-i Displacement | Not Applicable | This Criterion is not applicable as there are no activities that would require the resettlement of local residents affected by the Entity. |
| 9.7a-h Affected Populations and Organisations | Conformance | The Entity has identified their Stakeholders and their interests which have been mapped in accordance with their ISO45001 and 14001 certifications. The Entity is in close contact with the surrounding communities. Most employees reside in the local area. The Entity supports several social initiatives of Local Communities. |
| 9.8a Conflict-Affected and High-Risk Areas - Strong | Conformance | The Entity has implemented a third-party Due Diligence process and established a Supplier Code of Conduct. |
| Management Systems | | Code of Conduct for Suppliers: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks | Conformance | The Entity has implemented a Country Table and Risk matrix for Due Diligence assessment. All of the Entity's suppliers are ASI Certified and are audited regularly with the audit results used for supplier development. Suppliers' ASI Certificates are also checked on the ASI website. |

| CRITERION | RATING | COMMENT |
|--|---------------------------|---|
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks | Conformance | The Entity has conducted group internal audits that examine sanctions and trade controls and has defined appropriate measures for identified risks. |
| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence | Conformance | The Entity was audited against the ASI Performance Standard which includes an audit of Due Diligence processes and addresses this requirement of the Standard. |
| 9.8e Conflict-Affected and High-Risk Areas - Report annually | Minor Non- Conformance | Whilst the Entity has implemented a third-party Due Diligence process, the supply chain Due Diligence results are not publicly disclosed. |
| 9.9 Security practice | Conformance | The Entity's site security is provided by unarmed staff who are trained in and required to comply with the Entity's Code of Conduct. |
| 10. LABOUR RIGHTS | | |
| 10.1a-c Freedom of Association and Right to Collective Bargaining | Conformance | The Entity commits itself to respecting Workers' rights in its Code of Conduct and requests the same of its Suppliers. The Entity has two elected Workers' Councils (one for manual labour Workers and one for office Workers). |
| | | Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law | Not Applicable | This Criterion is not applicable to the Entity, as Austrian labour law does not restrict the right to Freedom of Association and Collective Bargaining. |
| 10.2a Child Labour | Conformance | Child labour is prohibited in Austria. Young Workers (from the age of 15 to 18) are provided special protection within the apprenticeship program and are not allowed to work in hazardous working environments. The Entity committed and expects its Suppliers, to comply with the prohibition of Child Labour. Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 10.3a-c Forced Labour | Conformance | The Entity commits itself, and expects its Suppliers, to comply with the prohibition of Forced Labour, slavery and Human Trafficking according to the Code of Conduct: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| | | All employees are either employed directly or through recognised labour agencies, providing all necessary documentation to employees. Workers are either Austrian citizens or have permanent working and living rights in Austria. No deposits or security payments are permitted. There is no restriction on Workers' movement at the site. The Human Resources department does not hold original documents but only copies of documents such as identification and passports in Workers' files. The time for announced termination of the working contract is regulated in the Collective Bargaining Agreement of the sector. |

| CRITERION | RATING | COMMENT |
|---|---------------------------|---|
| | | The Modern Slavery Statement (Slavery and Human Trafficking Statement (Fiscal Year 2022)) is available at: https://www.cflex.com/general-terms-conditions/code-of- conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&tx_d wboilerplate_cflex%5Bcontroller%5D=Cflex&tx_dwboilerplate_cflex%5B file%5D=849&cHash=e1859cf85415ff91b3f6fbcb6481c620 |
| 10.4a-c Non-Discrimination | Conformance | The Code of Conduct includes the Entity's commitment to non-Discrimination, it is neither tolerated at the site nor at its suppliers. The Entity details their actions in an annual anti-Discrimination report and the Code of Conduct. Other actions include training courses and non-discriminatory job advertisements. |
| 10.5 Communication and engagement | Conformance | Direct and frequent communication with Workers and the representatives of the Workers' Councils are established. Weekly meetings are held between the Human Resources Manager and elected worker representatives. During the Audit, the interviewed persons noted a positive working climate and direct communication. |
| 10.6a-g Violence and Harassment | Conformance | The Entity adheres to the Code of Conduct, that it does not tolerate any form of punishment and Harassment. Disciplinary measures are regulated by law and require written evidence and the involvement of worker representation. The Code of Conduct is the subject of quarterly presentations to the Safety Committee: https://www.cflex.com/general-terms-conditions/code-of-conduct |
| 10.7a-c Remuneration | Conformance | Wages are regulated through the Collective Bargaining Agreement of the sector. The Entity provides additional financial and non-financial benefits for the employees. All payments are documented and paid at the end of the month to the employees' bank accounts. |
| 10.8a-c Working Time | Conformance | Working hours are recorded electronically for all employees and paid with the relevant bonus payments (e.g. night shift, Overtime hours etc.). Working hours are controlled according to Austrian worktime law. |
| 10.9a-b Informing Workers of Rights | Conformance | As confirmed by interviews with Workers and human resources management during the audit, the Entity's Workers are informed about Human and Labour Rights during the onboarding process and directly through the Works Council. |
| 11. OCCUPATIONAL HEALTH A | ND SAFETY | |
| 11.1a Occupational Health and Safety (OH&S) Management System | Conformance | The Entity has a well-established Occupational Health and Safety (OH&S) Management System with risk assessments, audits and periodic in-depth training. The system is ISO 45001 certified: https://www.cflex.com/locations/constantia-teich-austria |
| 11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure | Minor Non- Conformance | Relevant Key Performance Indicators (KPIs) are monitored and documented by the Entity and published in the ESG Report 2023, available at: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/ConstantiaFlexibles_ESG_Report_2023.pdf |

| CRITERION | RATING | COMMENT |
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| | | However, the comparison of performance with peers and best practices is not publicly disclosed. |
| 11.2 Employee engagement on Health and Safety | Conformance | The Entity has implemented a system of Workers' involvement in health and safety. Worker representatives participate at the periodic Work Safety Council meetings every three months, and a 'zero accident culture' strategy is currently being implemented with Workers' participation (e.g. audits, identification of unsafe situations). |

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DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE | NOTES |
|----------|--------------|---|
| 0 | 15 May 2018 | Initial Certification Audit – 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. |
| 3 | 30 July 2024 | Re-Certification Audit and Scope Change from Performance Standard V2 to V3 |