

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Maxion Wheels Czech s.r.o. – Czech Aluminium

CERTIFICATE NUMBER  
416

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
GUTCERT (AFNOR  
GROUP)

DATE OF ISSUE  
4 DECEMBER 2024

DATE OF EXPIRY  
3 DECEMBER 2027

CERTIFIED SINCE  
4 DECEMBER 2024

## AUTHORISED BY

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

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

## CERTIFICATION SCOPE

Manufacture and distribution of  
light alloy wheels at the production  
site Maxion Wheels Czech s.r.o. in  
Ostrava, Czech Republic.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Maxion Wheels
ENTITY NAME	Maxion Wheels Czech s.r.o. - Czech Aluminium
CERTIFICATION SCOPE	Manufacture and distribution of light alloy wheels at the production site Maxion Wheels Czech s.r.o. in Ostrava, Czech Republic.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><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	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>8 – 11 July 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>7 November 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the manufacture and distribution of light alloy wheels at the light vehicle Aluminium wheels plant at Maxion Wheels Czech s.r.o. in Ostrava, Czech Republic.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><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><li><input checked="" type="checkbox"/> 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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	4 December 2024 – 3 December 2027
NEXT AUDIT TYPE	Surveillance Audit

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NEXT AUDIT DATE 3 June 2026

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CERTIFICATE NUMBER 416

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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

Maxion Wheels Czech s.r.o. - Czech Aluminium (the 'Entity') is a light vehicle Aluminium wheels plant in Ostrava, Czech Republic, which began operations in 1999. The 12 hectare (ha) production site is part of the Maxion Wheels Czech s.r.o, reports to Maxion Wheels Holding, located in Königswinter, Germany.

With a capacity of 1.8 million Aluminium wheels a year, the manufacturing process includes melting, Casting, heat treatment, machining, painting and associated support processes. The Facilities consist of two main production buildings and several smaller associated structures. These Facilities accommodate mould preparation, four melting furnaces, thirty casting machines, one heat treatment line, machining and bright machining processes, one painting line, and warehousing and logistical operations. The Entity supplies passenger car wheels to most major OEMs and employs approximately 420 people. The Entity is located in the city of Ostrava. The Ostravice River and its catchment area are classified as nearby potential sensitive receptors. Key external Stakeholders include the Moravian-Silesian region, the city of Ostrava with its respective district, Liberty Ostrava industrial complex, relevant local authorities in ESG areas, customers and suppliers.

The Entity is currently investing in increasing the automation and digitalization of the production process to further reduce its carbon footprint emissions in accordance with Maxion Wheels' goal to be 'carbon neutral' by 2040.

## 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	Low	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	As part of Maxion Wheels, the Entity has systems, processes and procedures to ensure awareness of and Compliance with Applicable Law and other binding obligations. Local and central teams regularly check legal compliance. The audited site is certified against the following management system standards: ISO 14001 (environment), ISO 45001 (Occupational Health & Safety) ISO 9001 and IATF 16949 (quality). At the time of the audit, the Entity also underwent an audit against TISAX (IT security) standards.
1.2 Anti-Corruption	Conformance	As part of Maxion wheels, the Entity has established and implemented a system to fight Corruption in all its forms. A global business Code of Conduct has been issued and communicated within the Entity and made publicly available. It is available on the Maxion Wheels website in several languages at: <a href="https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=1&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=23f4aa4d49bfc79620af37c588a7a8a7#download-list">https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=1&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=23f4aa4d49bfc79620af37c588a7a8a7#download-list</a>  Employees receive annual training in the lochpe-Maxion Code of Conduct (Maxion Wheels parent company) and there is a Compliance Officer who manages the Group's compliance efforts.
1.3a-e Code of Conduct	Conformance	Maxion Wheels has issued and communicated its Code of Conduct which is applicable to the Entity and addresses relevant ESG topics: <a href="https://www.maxionwheels.com/code-of-conduct">https://www.maxionwheels.com/code-of-conduct</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and communicated its Policy statements through different channels such as the website, SharePoint, emails to employees and an employee application. The Entity provides mandatory and voluntary training for its employees. Policies are endorsed by senior management and are regularly reviewed. Policies are made publicly available at the lochpe-Maxion Governance website at: <a href="https://www.iochpe.com.br/en/governance/code-of-conduct">https://www.iochpe.com.br/en/governance/code-of-conduct</a>  The Entity has implemented the Policies and obtained certification against the following recognised management system standards: ISO 14001 (Environment), ISO 45001 (Occupational Health & Safety), ISO 9001 and IATF 16949 (Quality).
2.2a-c Leadership	Conformance	The Safety and Sustainability Manager and the Human Resources Director take overall responsibility for the implementation of ASI requirements and lead the communication of the Policies at Maxion Wheels Czech Aluminium. Management provides the necessary resources required to establish, implement, maintain and improve the management systems required throughout the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and is maintaining an Environmental Management System certified by an accredited certification body to ISO 14001. The certificate is available upon request.
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has established a documented and active social management system as part of its integrated management approach. Social standards, procedures and records have been implemented.</p> <p>The Materiality of social topics was analysed and reviewed by lochpe-Maxion ('double Materiality' according to the European Corporate Sustainability Reporting Directive (CSRD)).</p>
2.4a-e Responsible Sourcing	Conformance	<p>Maxion Wheels has issued and communicated its Supplier Code of Conduct which is applicable to the Entity and addresses ESG (Environmental, Social and Governance) aspects:</p> <p><a href="https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=3&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=0ee74a633cd251434d5d9a3a8e761d40#download-list">https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=3&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=0ee74a633cd251434d5d9a3a8e761d40#download-list</a></p> <p>The Supplier Code of Conduct is regularly reviewed at the corporate level. Suppliers are screened and evaluated against ESG criteria. All current Aluminium suppliers are certified against the ASI Performance Standard.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is currently not applicable to the Entity, as there are no New Projects or Major Changes that have occurred, are currently happening nor are planned for the future.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is currently not applicable to the Entity, as there are no New Projects or Major Changes that have occurred, are currently happening nor are planned for the future.
2.7a-f Emergency Response Plan	Conformance	The Entity has established site specific emergency response plans which are regularly tested and reviewed. During the Audit it was demonstrated that relevant agencies have been involved in the set-up of the planning of emergency situations. These plans are available to relevant Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	As confirmed through a document review and interviews, the Entity has incorporated business resilience into its planning for abnormal situations. A crisis management manual has been issued and is regularly reviewed.
2.9a-b Mergers and Acquisitions	Conformance	The Entity is currently not in a post-merger or acquisition phase, however, lochpe-Maxion's legal team would be in charge of overseeing the management of Mergers and Acquisitions (M&As) if and when they occur.
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	lochpe-Maxion's central legal team is responsible for overseeing any Closure, Decommissioning or Divestment (CCD) activities. The Entity is not in a CCD phase. However, a documented procedure has not been developed to demonstrate that all environmental, social and governance practices will be considered, and that Affected Populations and Organisations will be consulted or asked to

CRITERION	RATING	COMMENT
		participate in the development of a plan for monitoring Material ESG impacts, including legacy impacts, associated with the closure, decommissioning or divestment.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its governance approach and its Material environmental, social, and economic impacts via the Maxion Wheels' informative Sustainability Report, based on the reporting standards of the Global Reporting Initiative (GRI) and further standards at: <a href="https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=1&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=23f4aa4d49bfc79620af37c588a7a8a7#download-list">https://www.maxionwheels.com/download-center/?tx_maxionsitepackage_downloadcenter%5Baction%5D=showCategory&amp;tx_maxionsitepackage_downloadcenter%5Bcategory%5D=1&amp;tx_maxionsitepackage_downloadcenter%5Bcontroller%5D=DownloadList&amp;cHash=23f4aa4d49bfc79620af37c588a7a8a7#download-list</a></p> <p>Entity-specific environmental data are publicly available on the official Czech IPPC website at: <a href="https://ippc.mzp.cz/ippc/ippc.nsf/%24%24OpenDominoDocument.xsp?documentid=EB82&amp;action=OpenDocument">https://ippc.mzp.cz/ippc/ippc.nsf/%24%24OpenDominoDocument.xsp?documentid=EB82&amp;action=OpenDocument</a></p>
3.2 Non-compliance and Liabilities	Minor Non-Conformance	<p>The Entity's management confirmed in writing that there have not been any Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.</p> <p>However, this information has not been made publicly available.</p>
3.3a-c Payments to Governments	Minor Non-Conformance	<p>The Entity does not contribute to political parties and that no payments were made to the Government other than taxes and fees.</p> <p>However, in the most recent version of the lochpe-Maxion annual Sustainability Report there is no specific statement relating to payments to Governments.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has established an ethics hotline applicable to the Entity, accessible via telephone and email in multiple languages: <a href="https://hotline.iochpe.com.br">https://hotline.iochpe.com.br</a></p> <p>However, the information provided on the Group's ethics hotline is incomplete, as relevant information is missing, including eligibility criteria, timeline and protection against retaliation.</p> <p>Additionally, a documented procedure addressing all requirements of the ASI Performance Standard was not available at the time of the Audit.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the life cycle impacts of a typical representative product and studied the impact of different sources of Aluminium. The assessment is based on "Sphera / LCA for Experts" (ex GaBi) software. The Life Cycle Assessment (LCA) has been documented.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity demonstrated that it provides 'cradle-to-gate' LCA information on its products, upon customer request. LCA information is also available in the lochpe-Maxion 2022 Sustainability Report, page 19: <a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lo">https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lo</a></p>

CRITERION	RATING	COMMENT
		<p><a href="#"><u>lochpe-Maxion_Sustainability_Report/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</u></a></p> <p>However, the provided information did not include underlying assumptions, including system boundaries.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as all product specifications are provided by its customers and the Maxion Wheels' central engineering & development team (not within the scope of the Entity). The Entity has no design activities of its own. However, the central design team has investigated all options for optimising weight while maintaining structural properties and has demonstrated its success on a number of products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise and monitor the generation of Aluminium process Scrap. There are measures in place to decrease the generation of production Scrap. Targets have been developed and the monitoring procedures of Scrap is implemented. Scrap quantities are regularly reviewed. All Aluminium Scrap is recycled internally (coated parts are currently stripped externally and then returned for internal remelting).
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has established a documented recycling strategy, however, the strategy with specific timelines, activities and targets has not been made publicly available.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity does not supply directly to consumers, rather it has a Business to Business (B2B) market. The Entity produces auto parts, and the recycling of automobiles is regulated and organised by the European Union (Directive 2005/64/EC on the type-approval of motor vehicles with regard to their reusability, recyclability and recoverability and amending Council Directive 70/156/EEC and Directive 2000/53/EC on end-of-life vehicles).</p> <p>However, the Entity works with an external partner, who collects and processes end-of-life Aluminium.</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity's data on Scopes 1, 2 and 3 Greenhouse Gas (GHG) emissions and energy use are available in the lochpe-Maxion 2022 Sustainability Report, page 60:</p> <p><a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf"><u>https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</u></a></p> <p>These data have been verified independently (limited assurance).</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 -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has implemented a GHG Emissions Reduction Plan and the GHG emissions reduction pathway is consistent with a 1.5°C warming scenario. The ASI's GHG tool has been used to demonstrate this. The pathway includes Intermediate Targets, covering a period no greater than five years. The GHG emission reduction pathway and plan are publicly disclosed in the lochpe-Maxion 2022 Sustainability Report, page 15:  <a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf">https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</a></p> <p>However, the publicly available GHG emissions related data in the 2022 report is aggregated at the Group level, data specific to the Aluminium business has not been made publicly available. As the data cover the year 2022, the data publicly available has not used the ASI endorsed methodology.</p>
5.4 GHG Emissions Management	Conformance	The Entity demonstrated that a system and processes are in place to implement its GHG reduction targets. The GHG Management System is integrated in the Entity's certified ISO 14001 Environmental Management System.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	Emissions to air are quantified and related data are summarised in the annual report, which is sent to the relevant authority, as the Entity is subject to the EU IED (Industrial emissions Directive). The report is publicly available via the IPPC - Integrated Pollution Prevention and Control by the Ministry of the Environment of the Czech Republic: <a href="https://ippc.mzp.cz">https://ippc.mzp.cz</a>
6.2a-g Discharges to Waters	Minor Non-Conformance	Occasionally certain wastewater parameters may exceed threshold limits, and on these occasions, the wastewater treatment works are informed who then work with the Entity to eliminate the exceedance. The fulfilment and exceedance of the limits have not yet been publicly communicated. Plans to minimise exposure to, and impacts from, Discharges to Water, have not yet been made publicly available.
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The risks and impacts of Spills and Leakage are regularly assessed within the framework of the Environmental Management System, and assessment results are recorded in the environmental register.</p> <p>A spill prevention plan is in place, however, until the time of the Audit, emergency drills (for spills) have not yet been organised for Workers.</p>
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	Management and Workers confirmed that no Material Spills or Leakages happened at the site since Maxion Wheels acquired the site, as confirmed by management and Workers. However, the Entity has not made this information publicly available.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity's waste management practices are not fully effective, as a few isolated deficiencies have been observed, related to updating its waste management procedure, cleaning of catch pans and

CRITERION	RATING	COMMENT
		publication of waste-related data specific to the Entity but agglomerated for the whole Group.
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.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity demonstrated that its water withdrawal and use by source and type have been identified and mapped. Water consumption is monitored as KPI within the Environmental Management System. The Entity has assessed the water related risks in Watersheds and concluded that for the time being, the risks are not Material.</p> <p>At the Group level, aggregated data on water consumption and discharge is available in Iochpe-Maxion 2022 Sustainability Report, pages 23 and 61:  <a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/Iochpe-Maxion_Sustainability_Report_2022_FINAL.pdf">https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/Iochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment determined the risk related to water withdrawal and discharge as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The risks and potential impacts on Biodiversity and Ecosystem Services have been assessed within the Entity's Area of Influence using the WWF Biodiversity Risk Filter tool: (<a href="https://riskfilter.org/biodiversity/home">https://riskfilter.org/biodiversity/home</a>).</p> <p>The Entity is located within an industrial complex adjacent to a large steel mill. There are no areas with sensitive Biodiversity or ecosystems identified in its immediate vicinity of the Entity.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as it has assessed risks on Biodiversity and on Ecosystem Services in its Area of Influence which concluded that the Entity is not dependent on specific Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as there are no areas with sensitive Biodiversity or ecosystems identified in its immediate vicinity of the Entity.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services impacts have been identified. Due to the nature of the business, only limited direct effects on any Ecosystem Services can be expected. The Biodiversity and Ecosystem Services assessment concluded that the Entity is not dependent on specific Ecosystem Services.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	A risk assessment of potential impacts from alien and invasive species was included in the Biodiversity risk assessment and the risk was assessed as low.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	There are no World Heritage Sites located near the Entity, with the nearest UNESCO World Heritage location is the Holy Trinity Column, situated in Olomouc approximately . 80 kilometres from the Entity.
8.6a-d Protected Areas	Conformance	The Entity has identified the nearest Protected Areas to its location, which are not directly adjacent to the site. The nearest key Biodiversity area is the Hermansky Stav-Odra-Poolsi wetlands (KBA 2942), located approximately 10 kilometres from the Entity. Additionally, the landscape conservation area CHKO Poodří (KBA 2937) is about five kilometres from the Entity. Since both areas are well outside the Entity’s Area of Influence, a management plan related to Protected Areas is not required.
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	<p>The Entity as part of the lochpe-Maxion Group has a Code of Conduct, where the Group confirms that it fulfills its social responsibilities by carrying out its activities with productivity, supplying quality products and providing good services, complying with the Applicable Laws and regulations, avoiding waste and respecting the environment, cultural values, Human Rights and social organization of the communities in which it operates. The audited Entity has implemented a Human Rights Due Diligence process and conducted a Human Rights Impact Assessment. The identified risks were rated as ‘non-existent’ up to ‘low-medium’.</p> <p>However, the Entity’s Human Rights Due Diligence procedure is incomplete, as certain design elements are currently absent, including the definition of the frequency of the process, consultation of potentially affected Stakeholders, mapping of Affected Populations and Organisations, tracking the effectiveness of actions taken and performance monitoring.</p>
9.2a-e Gender Equity and Women’s Empowerment	Minor Non-Conformance	<p>The Entity as part of lochpe-Maxion Group has a global initiative to systematically raise awareness and improve gender diversity and inclusion (D&amp;I). Various programs have been initiated (e.g. female network, D&amp;I training for employees) and targets and metrics have been defined.</p> <p>In its Sustainability Report 2022 (pages 38-39), the Group has provided information about its approach regarding diversity and inclusion, including topics such as gender balance and pay equity:  <a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf">https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</a></p>

CRITERION	RATING	COMMENT
		However, on the Entity level, the program to promote gender equity and women's empowerment is not fully effective, as few deficiencies related to Worker wellbeing and workplace culture were observed.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
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 in 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 to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is located in an industrial zone outside the town of Ostrava in the Czech Republic. The Entity has undertaken an assessment for Cultural and Sacred Heritage and has confirmed the absence of cultural heritage sites in its Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as The Entity has confirmed the absence of cultural heritage sites in its Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the certification period.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	The Entity's Human Rights assessment did not identify any salient issues about the communities near the vicinity of the facility. However, a group of minority people living next to the site has not been identified or considered as Stakeholders by the Entity.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has demonstrated that there are processes in place to ensure a risk-based Due Diligence throughout its Aluminium supply chain. Management regularly conducts documented risk assessments.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	As part of the Lochpe-Maxion Group, the Entity has implemented a risk management process focusing on how critical suppliers of goods and services impact their business. These include several strategies to mitigate related risks, such as supplier development and monitoring risks and performance. The strategy is supported by a specialised service provider, who provides alerts and analyses of suppliers.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	As part of the Lochpe-Maxion Group, the Entity has defined a documented strategy to respond to identified risks. However, at the time of the Audit, this strategy was not yet specific on ESG topics and

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		especially on the response to salient Human Rights violations. A documented risk management plan had also not been developed
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has publicly reported on its supply chain Due Diligence process in the Iochpe-Maxion 2022 Sustainability Report, page 55: <a href="https://www.iochpe.com.br/en/sustainability-report">https://www.iochpe.com.br/en/sustainability-report</a>  However, the provided information within the Report does not address all the required information for annual reporting.
9.9 Security practice	Conformance	The Entity's Human Rights risk assessment did not identify Material risks related to security practices. Worker interviews confirmed there are no known Human Rights violations caused by the security service. Security is operated by a trained and licensed external service provider, which is committed to abide by the Entity's Code of Conduct.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Freedom of Association as outlined in the Code of Conduct: <a href="https://api.mziq.com/mzfilemanager/v2/d/aa331a3b-0a4a-4acc-a70e-512ff88e3c02/d5a821ae-9b35-74ef-b840-9d1cc8766924?origin=1">https://api.mziq.com/mzfilemanager/v2/d/aa331a3b-0a4a-4acc-a70e-512ff88e3c02/d5a821ae-9b35-74ef-b840-9d1cc8766924?origin=1</a>  A collective agreement has been negotiated at the Entity level and union Representatives are freely elected by union members. Regular monthly meetings with management are held.
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 Freedom of Association and Collective Bargaining is not restricted by law.
10.2a Child Labour	Conformance	The Entity's Code of Conduct, states that Iochpe-Maxion does not allow Child Labour nor does the company permit those under the age of 18 to work on their production lines, as well as suppliers must not allow Child Labour. The Entity adheres to all regulations and laws related to Child Labour laws and does not employ individuals under the age of 16, or 18 years respectively in hazardous working environments.  The Entity's Code of Conduct is available at: <a href="https://www.maxionwheels.com/code-of-conduct">https://www.maxionwheels.com/code-of-conduct</a>
10.3a-c Forced Labour	Minor Non-Conformance	The Entity's Code of Conduct, states that it "prohibits any type of slave or forced labour or compulsory labour, and does not support, contribute to, assist or facilitate human trafficking".  Code of Conduct: <a href="https://www.maxionwheels.com/code-of-conduct">https://www.maxionwheels.com/code-of-conduct</a>  A site tour, document review and Worker interviews confirmed that the Entity does not engage in nor support the use of Forced Labour, neither directly nor indirectly. However, the Entity has not publicly

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		disclosed an annual Modern Slavery Statement detailing their actions to address Modern Slavery.
10.4a-c Non-Discrimination	Conformance	<p>As part of the lochpe-Maxion Group, the Entity is committed to non-Discrimination and communicates this commitment clearly in its Code of Conduct: <a href="https://www.maxionwheels.com/code-of-conduct">https://www.maxionwheels.com/code-of-conduct</a></p> <p>The Entity does not engage in, nor supports Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to Discrimination. This was confirmed via interviews and a document review. Employees receive periodic training in the Code of Conduct.</p>
10.5 Communication and engagement	Conformance	As confirmed by interviews with Workers and management as well as by a document review, the Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment. The Entity uses a variety of communication channels (e.g. a mobile phone application).
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>Respectful behaviour is addressed in the Code of Conduct: <a href="https://www.maxionwheels.com/code-of-conduct">https://www.maxionwheels.com/code-of-conduct</a></p> <p>However, the Code of Conduct does not address all relevant aspects of an effective Policy on Violence and Harassment (e.g. a workplace Harassment and Violence risk assessment; provision of necessary support and facilitation to the victims as needed to recover/rehabilitate from any injury or trauma incurred; monitoring and evaluation of the Policy to assess its effectiveness in preventing and eliminating violence and harassment in the workplace).</p> <p>Worker interviews confirmed there is no evidence of Violence or Harassment.</p>
10.7a-c Remuneration	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working Time, payment and leave are negotiated in Collective Bargaining agreements. The wages paid are above the legal minimum wage and are in line with the national industry standard.
10.8a-c Working Time	Minor Non-Conformance	With the exception of a few isolated cases, the Entity complies with Applicable Law and local industry standards on Working Time, public holidays and paid annual leave. Working Time forms part of the Collective Bargaining Agreement and each employment contract. However, approximately, two percent of Workers exceeded the legally demanded limitation of working hours as their voluntary Overtime exceeded 150 hours within a 26-week period.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and management during the Audit, the Entity's Workers are informed about Human and Labour Rights during the onboarding process and thereafter. All Workers receive regular documented training on the Code of Conduct and access to rules, procedures and law texts.

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<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has an ISO 45001 certified Occupational Health and Safety (OH&amp;S) Management System. The Entity has implemented and communicated the HSEQ Policy:  <a href="https://www.maxionwheels.com/hseq-policy">https://www.maxionwheels.com/hseq-policy</a></p> <p>Site specific safety terms and conditions are covered in the Local Health And Safety Terms And Conditions:  <a href="https://www.maxionwheels.com/supplier">https://www.maxionwheels.com/supplier</a></p> <p>However, a few isolated deficiencies were observed related to driver safety on-site and the permissible load stored on storage racks.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has an ISO 45001 certified Occupational Health and Safety (OH&amp;S) Management System. The Entity has implemented and communicated the OH&amp;S Policy and reviews its Management System including its Policy annually.</p> <p>At the Group level, data relating to the effectiveness of the OH&amp;S Management System is included in the lochpe-Maxion 2022 Sustainability Report, pages 35 and 62:  <a href="https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf">https://www.maxionwheels.com/fileadmin/Corporate/Sustainability/lochpe-Maxion_Sustainability_Report_2022_FINAL.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	<p>A joint Health &amp; Safety Committee, with representation of Workers has been implemented. The Committee meets at least quarterly, and outcomes are documented. Effectiveness of the Health and Safety Committee has been demonstrated by the progress on the list of actions.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	4 December 2024	Initial Certification Audit – Full Certification
1	7 January 2025	Correction to the Next Audit Date to 3 June 2026