

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ST Extruded Products Germany GmbH

CERTIFICATE NUMBER
398

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
CERTAINABLE GMBH

DATE OF ISSUE
23 DECEMBER 2024

DATE OF EXPIRY
22 DECEMBER 2025

CERTIFIED SINCE
23 DECEMBER 2024

AUTHORISED BY

CERTIFICATION SCOPE

Production of Aluminium extruded
Products at ST Extruded Products
Germany GmbH, located in Bonn
(Germany)

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

* Provisional Certification is valid
for the period of one year, during
which the company can address
the non-conformances assessed
and subsequently seek full
certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	STEP-G
ENTITY NAME	ST Extruded Products Germany GmbH – Werk Bonn
CERTIFICATION SCOPE	Production of Aluminium extruded Products at ST Extruded Products Germany GmbH, located in Bonn (Germany)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Certainable GmbH
AUDIT DATE	<ul style="list-style-type: none">11 – 12 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 September 2024
AUDIT SCOPE	<p>The Audit Scope included the production of Aluminium extruded Products at ST Extruded Products Germany GmbH in Bonn (Germany).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	23 December 2024 – 22 December 2025
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE 22 June 2025

CERTIFICATE NUMBER 398



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

STEP-G produces extruded profiles and lightweight solutions across locations in Germany, Belgium and China. ST Extruded Products Germany GmbH – Werk Bonn (the ‘Entity’) commenced operations in 1921, and is located in the northwest of Bonn, Germany. The Entity’s factory premises are located south west of the Rhine River. In the Auerberg district, the Entity’s premises are bordered to the south-west by the A555 autobahn (Cologne - Bonn), to the southeast by Friedrich-Wöhler-Straße Bonn and the northwest by Antilopenweg. The property in which the Entity is situated within is designated as an industrial area according to the development plan. It is surrounded by residential buildings and a commercial area.

The Entity is an extrusion plant that operates Europe’s largest extrusion press that produces extrusion profiles for rail and automotive customers in Central Europe, welding operations and mechanical fabrication, and produces approximately 18,000 tonnes per annum. The Entity has three extrusion lines, welding operations, further fabrication machines and a despatch area.

The Entity has approximately 350 workers and key external stakeholders include Government (local, regional, EU), neighbours, customers, Union, employees and the parent company.

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	Medium	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	High	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, Procedures and processes that provides a system to maintain awareness of and to ensure Compliance with Applicable Law.</p> <p>The Entity has implemented and maintains an integrated Management System, which is certified against the ISO 14001 and ISO 45001 standards by an accredited certification body. Furthermore, the Entity successfully holds an EMAS validation. Certificates are available at: https://www.step-g.com/de/download</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. Its Code of Conduct and Supplier Code of Conduct are publicly available.</p> <p>Code of Conduct: https://www.step-g.com/fileadmin/content_STEP-G/Download/Verhaltens_und_Ethikkodex/stepg_verhaltens_und_ethikkodex_de.pdf</p> <p>Supplier Code of Conduct: https://www.step-g.com/fileadmin/content_STEP-G/Download/Lieferantenkodex/stepg_Lieferantenkodex.pdf</p> <p>The Entity has established multiple anti-Corruption measures, including Policies, training, Due Diligence monitoring and a 'whistleblower' line (www.kbm-legal.com/ksm-box), endorsed by senior management. Affected employees received anti-Corruption training.</p>
1.3a-e Code of Conduct	Minor Non-Conformance	<p>The Entity has issued and made publicly available its Code of Conduct:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Verhaltens_und_Ethikkodex/stepg_verhaltens_und_ethikkodex_de.pdf</p> <p>The Code includes principles relevant to environmental, social and governance performance. However, an employee's training in the Code of Conduct could not be demonstrated during the Certification Audit.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with environmental, social and governance practices. The Policies are made publicly available in the Company Policy:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Unternehmenspolitik/Unternehmenspolitik_STEP-G_deutsch.pdf (German)</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Unternehmenspolitik/Unternehmenspolitik_STEP_G_englisch.pdf (English)</p> <p>The Entity has conducted training for its employees to make them aware of the Policies. The Policies are endorsed by senior management.</p>
2.2a-c Leadership	Conformance	<p>The Entity's Managing Director has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard, leading the communication of the Entity's Policies and</p>

CRITERION	RATING	COMMENT
		providing sufficient resources to support its implementation. Responsibilities are reflected in the organisational chart.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System, which has been controlled and certified according to ISO 14001:2015 and EMAS validated. The certificates are accessible at: https://www.step-g.com/download
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	The Entity has demonstrated Compliance with social regulations and principles and various Human Rights processes are documented. However, a formal Social Management System that provides for the effective management of the Entity's social Policies and activities has not yet been implemented.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has implemented and made publicly available their responsible sourcing Policy, the Supplier Code of Conduct: https://www.step-g.com/fileadmin/content_STEP-G/Download/Lieferantenkodex/Lieferantenkodex_Stand_April_2024_Version_01.pdf The Entity's sourcing process is documented, and regular supplier evaluations are undertaken. However, the definition of social aspects in supplier risk assessments and supplier onboarding processes has not yet been fully established.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. Regardless, the Entity has issued a documented procedure that addresses the requirements related to Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. Regardless, the Entity has issued a documented procedure that addresses the requirements related to Human Rights Impact Assessments.
2.7a-f Emergency Response Plan	Conformance	The Entity has established site-specific Emergency Response Plans (ERPs), as confirmed by document review, interviews and on-site auditing activities. The ERPs have been developed in collaboration with relevant Stakeholders (e.g., fire brigade) and are communicated internally. The plans comprise both preventive and corrective measures. The ERPs are available to external Stakeholders upon request. Due to the type and nature of the Business, any emergency likely to affect adjacent neighbours or the environment is managed by the public fire brigade.
2.8a-d Suspended Operations	Conformance	The Entity has systematically identified and evaluated risks associated with its operations. Specific contingency measures associated with suspended operations have been defined for identified risks, as confirmed during the site visits.
2.9a-b Mergers and Acquisitions	Conformance	The Entity confirmed that it has not undergone or planned a merger or acquisition (M&A) since joining ASI. Regardless, the Entity has a documented process in place to manage M&As.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. The closing and decommissioning of the Entity's foundry were undertaken prior to joining ASI, however, the official closure plans were examined as part of the Audit. No closure or decommissioning activities are planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in its 2023/2024 Sustainability Report, which is aligned with Global Reporting Initiative (GRI) guidelines: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
3.2 Non-compliance and Liabilities	Minor Non-Conformance	The Entity confirmed that at the time of publication of the Sustainability Report, there were no pending legal violations and associated fines, judgements, penalties or non-monetary sanctions. However, information on Material fines, judgements, penalties and non-monetary sanctions for failure to comply with Applicable Law is not currently disclosed on an annual basis.
3.3a-c Payments to Governments	Conformance	The Entity provides information on payments to political parties in its Annual Sustainability Report 2023/2024, page 41: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	A Grievance Mechanism has been implemented by the Entity. No grievances have been received to date. The link to the anonymous reporting channel is available on the Entity's website at: https://www.step-g.com/contact/whistleblower-feedback-form
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Product lines (extrusion profiles) and has published these data at: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_LCA_Strangpressprofil.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has evaluated the life cycle impacts of its major Product lines (extrusion profiles) and has published these data at: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_LCA_Strangpressprofil.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as Products are manufactured exclusively to customer design specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has a target 100% of Scrap for collection, recycling or reuse. It works continually and systematically to minimise the generation of Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		
4.4d Collection and Recycling of Products at End of Life	Not Applicable	The Entity's extrusion plants do not have Product development functions. All produced materials are developed by customers. Completed fabrication of the semi-finished Product is undertaken at the customers premises.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Step-G Group has issued and publicly disclosed Material Greenhouse Gas (GHG) emissions (including Scopes 1, 2 and 3) and energy use on an annual basis in its Sustainability Report, pages 29 and 32:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf</p> <p>The Entity's energy and GHG emissions data have been independently verified.</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	Conformance	<p>The Entity has issued its GHG Emissions Reduction Plan, consistent with a 1.5°C Warming Scenario. The GHG reduction plan is publicly disclosed in the 2023/2024 Sustainability Report, pages 6-8 and 10:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Klimaprogramm.pdf</p> <p>The GHG emissions and energy situation was reviewed by the Entity's management. This review will take place annually.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a system and processes to implement its GHG Emissions Reduction Plan and targets. The management of GHG emissions is integrated into the Entity's Environmental Management System, which is certified to ISO 14001.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has an Emissions Sources Overview Plan and Emissions to Air are recorded. All emissions sources have been evaluated and the emissions reduction plan has been developed. An independent evaluation has been completed.</p> <p>Emissions to Air are publicly disclosed in the 2023/2024 Sustainability Report, pages 32-33:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	All the Entity's wastewater discharges are directed to the central sewer discharge point, which complies with its environmental permit. The Entity's Discharges to Water have been quantified at the site level and publicly disclosed in the 2023/2024 Sustainability Report, pages 30: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System and major risks related to Spills and Leakages have been evaluated regularly. The Environment, Health and Safety (EHS) Department ensures regular inspections and weekly observations are undertaken. Approved emergency plans are in place. There have been no recent major incidents and therefore communication with the relevant authorities has not been required.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has confirmed that it has not experienced Material Spills or Leakages during the reporting period. If there are any Spills or Leakages, these will be disclosed in the Entity's Sustainability Report.
6.5a-c Waste Management and Reporting	Conformance	The Entity has quantified and publicly disclosed its Hazardous and Non-Hazardous Waste in the 2023/2024 Sustainability Report, page 33-34: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf The Material impacts to human well-being and the environment have been assessed in the EHS Risk Assessment and the Entity has implemented a waste reduction plan.
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	Conformance	The Entity has implemented an ISO 14001 certified Environmental Management System and water-related risks have been evaluated as part of the environmental impact analysis. The analysis did not identify any Material risks related to water withdrawal. The Entity's water source and consumption is publicly disclosed in the 2023/2024 Sustainability Report, page 30: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material water-related risks were identified in the risk assessment.

8. BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Whilst the risks and impacts on Biodiversity were both determined as low, the Entity has integrated Biodiversity assessment and management into the ISO 14001 certified Environmental Management System. More information is publicly disclosed in the 2023/2024 Sustainability Report, page 30: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and impacts on Biodiversity and Ecosystem Services were determined as low.
8.2a-g Biodiversity Management	Conformance	Whilst the risks and impacts on Biodiversity were determined as low, the Entity has integrated Biodiversity assessment and management into the ISO 14001 certified Environmental Management System.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity works to prevent accidental or deliberate introduction of Alien Species. A potential risk identified is the use of wooden pallets, and the Entity manages this risk by sourcing all pallets locally.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The annual environmental statement (Eco-Management and Audit Scheme (EMAS) certification) examined the impact on cultural sites, and any potential expansions are subject to German building regulations and the associated inspections and required permits. As a result, the Entity will not explore or develop New Projects or make Major Changes in World Heritage Properties.
8.6a-d Protected Areas	Conformance	As part of the EMAS certification, an assessment of Protected Areas was conducted, and the Entity does not operate in or near any Protected Areas.
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	Minor Non-Conformance	The Entity has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights, page 8: https://www.step-g.com/fileadmin/content_STEP-G/Download/Verhaltens_und_Ethikkodex/stepg_verhaltens_und_ethikkodex_de.pdf The Entity has conducted a documented Human Rights Due Diligence (HRDD) with internal Stakeholders. The HRDD has confirmed that there are no salient adverse Human Rights impacts the Entity has caused or contributed to. However, a systematic consultation of external Stakeholders within the HRDD has currently not been completed.

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Major Non-Conformance	<p>The Entity has developed and implemented Policies and processes that conform to the gender equity and women's empowerment requirements. Interviews and document reviews confirm there is no indication of deliberate Discrimination against women.</p> <p>However, the Entity has no appropriate program to promote gender equity and women's empowerment in employment practices, training opportunities, awarding of contracts, processes of engagement, and management activities.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
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 the site is located in central Europe and Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity's Due Diligence process did not identify any sacred or cultural heritage sites and values within its Area of Influence. 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 is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Indigenous peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as confirmed by interviews, the Entity did not require the resettlement or cause the displacement. The Entity's senior management confirmed that this is also not planned for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Stakeholder assessment has confirmed that there are no salient issues with Local Communities and therefore no need for action.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has issued and made publicly available its Supplier Code of Conduct: https://www.step-g.com/fileadmin/content_STEP-G/Download/Lieferantenkodex/Lieferantenkodex_Stand_April_2024_Version_01.pdf</p> <p>Processes are in place to ensure conformance with the requirements of this criterion.</p>

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	The Entity only sources Aluminium from within the EU. However, the Entity has not implemented processes to formally identify and assess risks along its supply chain corresponding to the identification of CAHRAs.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	The Entity has developed a Supplier Code of Conduct, which states a commitment to the OECD Guidelines. However, a strategy to respond to risks within the supply chain has not yet been fully implemented.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has developed a Supplier Code of Conduct, which states a commitment to the OECD Guidelines. Furthermore, the Entity's Due Diligence practices were audited as part of this Third Party ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has developed a Supplier Code of Conduct, which states a commitment to the OECD Guidelines. Furthermore, the 2023/2024 Sustainability Report (page 12) reports there that no abnormalities were detected regarding CAHRAs. However, a formal annual reporting on supply chain Due Diligence has not yet been fully implemented.
9.9 Security practice	Not Applicable	This Criterion is not applicable, as the Entity does not use or employ security services on site.

10. LABOUR RIGHTS

10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Interviews with Workers and their representatives confirmed that the Entity respects the rights of Workers to unite freely, seek representation and join the Works Council without interference. The site has a freely elected Worker representation and abides by Collective Bargaining Agreements agreed with the unions.
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 the right to Freedom of Association and Collective Bargaining is not restricted in the country (Germany) where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity neither uses nor supports Child Labour. The minimum working age of 15 years is respected. The youngest employee was a trainee who was 18 years old. Those young employees receive vocational training which is regulated in official training plans. An internally qualified instructor ensures that the work of the trainees is not exploitive, hazardous or interfering with schooling and apprenticeship programs. The Entity has robust practices to ensure that children are not employed.
10.3a-c Forced Labour	Conformance	The Entity does neither engage in, nor supports the use of Forced Labour. The Entity does not engage in, nor supports Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and management as well as a document review. In their Modern Slavery Statement (Statement STEP-G Moderne Sklaverei), the Entity stated that they do not tolerate any form of Human Trafficking or Child Labour and are fundamentally opposed to any type of Forced or compulsory Labour. The Modern Slavery Statement is publicly disclosed at:

CRITERION	RATING	COMMENT
		https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Statement_Sklaverei.pdf
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Verhaltens_und_Ethikkodex/stepg_verhaltens_und_ethikkodex_de.pdf</p> <p>The Code has been made available to Workers. As confirmed by interviews and document review, the Entity does not engage in or support Discrimination on grounds mentioned in this Criterion. The Entity remains called upon to work to eliminate the historical disadvantage of women.</p>
10.5 Communication and engagement	Conformance	Workers, Worker representatives and management confirmed that the Entity communicates appropriately and cooperates in good faith with Workers and their representatives on work-related issues. Works Council members and management meet on a regular basis.
10.6a-g Violence and Harassment	Conformance	<p>The Entity is committed to a respectful working environment. They have prohibited any form of Harassment or pressure in the workplace, nor do they tolerate Discrimination or corporal punishment. see Code of Conduct, page 9:</p> <p>https://www.step-g.com/fileadmin/content_STEP-G/Download/Verhaltens_und_Ethikkodex/stepg_verhaltens_und_ethikkodex_de.pdf</p> <p>The Code is communicated internally, and all Workers receive related training. The Code will be regularly reviewed. As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers as mentioned in the requirements of this Criterion.</p>
10.7a-c Remuneration	Conformance	All Workers are provided with a written contract at the commencement of their employment. 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. Wages are above the living wage and meet the national industry standard.
10.8a-c Working Time	Conformance	Interviews and document review confirmed that the Entity complies with relevant law and collective agreements on Working Time, public holidays and annual leave. The provisions in place ensure that Workers have time off and length of workdays are compliant with Applicable Law, and industry standards.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers, Works Council and Human Resources Management at Audit, the Entity's Workers are informed about Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the Code of Conduct. Every employee has the opportunity to obtain necessary information on "Aushangpflichtige Gesetze" (Laws requiring posting). As an employer, the Entity must inform employees about certain laws and regulations (e.g. by posting them on notice boards.)

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an ISO 45001:2018 certified and fully integrated Occupational Health and Safety (OH&S) Management System.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented an ISO 45001:2018 certified OH&S Management System, which ensures an annual management review is undertaken. Leading and lagging indicators are defined and key data are compared and evaluated against the industry benchmark in the 2023/2024 Sustainability Report, pages 36-38: https://www.step-g.com/fileadmin/content_STEP-G/Download/Nachhaltigkeit/2024_STEP-G_Nachhaltigkeitsbericht.pdf
11.2 Employee engagement on Health and Safety	Conformance	Employees are well integrated into OH&S practices in the workplace, which includes the Workers participating in risk assessments and OH&S Committee meetings.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 December 2024	Initial Certification Audit – Provisional Certification