

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Constantia Aloform

CERTIFICATE NUMBER  
**413**

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

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**BUREAU VERITAS  
CERTIFICATION**

DATE OF ISSUE  
**17 JANUARY 2025**

DATE OF EXPIRY  
**16 JANUARY 2028**

CERTIFIED SINCE  
**17 JANUARY 2025**

## AUTHORISED BY

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

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

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

## CERTIFICATION SCOPE

The final conversion of Aluminium  
by deep drawing of Aluminium  
trays for packaging industries at  
the Constantia Aloform facility in  
Werdohl, Germany.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Constantia Flexibles International GmbH
ENTITY NAME	Constantia Aloform
CERTIFICATION SCOPE	The final conversion of Aluminium by deep drawing of Aluminium trays for packaging industries at the Constantia Aloform facility in Werdohl, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Material Conversion</li><li>• Other Manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>• 19 – 23 August 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 3 November 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope included final conversion of Aluminium by deep drawing of Aluminium trays for packaging industries at the Constantia Aloform facility in Werdohl, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Material Conversion</li><li>• Other Manufacturing or sale of products containing Aluminium</li></ul> <p>All relevant 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 17 January 2025 – 16 January 2028

---

NEXT AUDIT TYPE Surveillance Audit

---

NEXT AUDIT DATE 16 January 2027

---

CERTIFICATE NUMBER 413

---



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 Aloform (‘the Entity’) is a part of the Constantia Flexibles International GmbH Group. The Entity has operated since 2008 and is based in Werdhol, North-Rhine Westphalia, 50 kilometres south of Dortmund, Germany. The Entity is involved in the ‘deep drawing’ of Aluminium trays, a process in which rolled sheet metal is drawn into a mechanical die by a punch action. The Aluminium trays are used for human food, pet food, pharmaceutical and hygiene industries. The facility currently employs around 120 Workers, with current annual production of 2.4 billion deep-drawn containers.

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity maintains a register of all Applicable Laws for Compliance purposes which is updated regularly. Internal auditing occurs as part of the Entity’s integrated Management System to ensure Compliance.
1.2 Anti-Corruption	Conformance	The Entity has a well-established system to combat Corruption in all its forms, including Bribery. An Anti-Corruption guideline is in place. Employees are required to participate in web-based training and to complete assessments on Anti-Corruption principles. A global whistle-blowing hotline is also in place.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct for both internal and external use. The Code is available on the Entity’s public and internal websites, and staff are trained on the Code of Conduct annually. In the external version, a whistle blower hotline is communicated whilst in the internal version contact persons are also communicated. The Code of Conduct for employees is accessible at:  <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de</a></p> <p>The Code of Conduct for Suppliers and Subcontractors is accessible at:  <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx</a></p>

CRITERION	RATING	COMMENT
		<a href="#">_dwboilerplate_cfle%5Bfile%5D=851&amp;cHash=b971265fb5a83a90958e3a0ed47f5eaf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has an integrated Management System for Environmental, Social and Governance (ESG) compliance, with implementation strongly supported by the Entity's management team. Policies include the Code of Conduct, the Environment Policy, the Health, Safety, Security and Environment Policy etc. Policy implementation is monitored through the Entity's internal auditing systems. System effectiveness is reviewed during annual management reviews and all strategic documents and policies are reviewed every three years. Policies are communicated to staff and externally on the Entity's website at: <a href="https://www.cfle.com/sustainability">https://www.cfle.com/sustainability</a>
2.2a-c Leadership	Minor Non-Conformance	The Entity has defined responsibilities for senior Management Representatives to lead the implementation of the Aluminium Stewardship Initiative's (ASI) Standards. There are however no documented records of the transfer of responsibilities within the Entity.
2.3a Environmental and Social Management Systems – Environmental	Minor Non-Conformance	The Entity has implemented an Integrated Management System, however, the Management System does not currently include an environmental risk assessment or impact assessment and the site-specific environmental programme could also not be verified.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System which is regularly audited against SEDEX/SMETA standards.
2.4a-e Responsible Sourcing	Conformance	The Entity is highly committed to responsible sourcing, and is a founding member of ASI and a supporter of several other similar initiatives. The Entity is also rated by EcoVadis, participates in the Carbon Disclosure Project (CDP) and holds both Forestry Stewardship Council (FSC) Chain of Custody Certifications. Responsible sourcing is implemented through Supplier assessments. The Entity's Ethical Sourcing Policy is accessible at: <a href="https://www.cfle.com/sustainability/corporate-sustainability/cfle?tx_dwboilerplate_cfle%5Baction%5D=download&amp;tx_dwboilerplate_cfle%5Bcontroller%5D=Cfle&amp;tx_dwboilerplate_cfle%5Bfile%5D=1515&amp;cHash=2fc052d571f246766aaf7930426dc245">https://www.cfle.com/sustainability/corporate-sustainability/cfle?tx_dwboilerplate_cfle%5Baction%5D=download&amp;tx_dwboilerplate_cfle%5Bcontroller%5D=Cfle&amp;tx_dwboilerplate_cfle%5Bfile%5D=1515&amp;cHash=2fc052d571f246766aaf7930426dc245</a>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the existing Facility. The Entity's social impact is addressed through SEDEX/SMETA certification, which includes gender analysis and health and safety assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the existing Facility.
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity has developed a site-specific Emergency Response Plan. The Entity has not however fully involved all Stakeholders in the plan development, and the Plan is not currently publicly disclosed.

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity's parent company maintains a Business Resilience Plan for all sites within the Group. A holistic risk evaluation (a 'Risk Run') is conducted by the Global Risk Manger twice annually. Senior Management reviews the results of the risk evaluation.
2.9a-b Mergers and Acquisitions	Conformance	All mergers and acquisitions, including the Due Diligence process, are managed by Entity's parent company, which has established relevant Policies.
2.10a-b Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment processes are managed by the Entity's parent company, which has established relevant Policies.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publishes its sustainability data in its parent company's annual ESG Report, and the Group Sustainability Report. The Entity provides sustainability data to platforms including EcoVadis and the Carbon Disclosure Project (CDP) who verify and rate these data. Product specific sustainability data are provided to the Entity's clients.</p> <p>The most recent parent company public reporting is available at: <a href="https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf">https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf</a></p> <p>The most recent Group level public reporting is available at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has implemented a well-established system to avoid legal Non-compliances and Liabilities. No fines or other liabilities for Non-compliances were received in the reporting period. Any such fines would be reported in the Entity's parent company's annual ESG Report: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented a clear system of Policies and procedures regarding anti-Corruption and Bribery. A detailed system of reporting and internal audits exists to guarantee compliance is implemented within the group and at the Facility. This system is described in the Entity's internal Code of conduct: <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de</a></p> <p>Anti-Corruption and Bribery is also addressed in the Code of Conduct for Suppliers and Subcontractors: <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=851&amp;cHash=b971265fb5a83a90958e3a0ed47f5eaf">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=851&amp;cHash=b971265fb5a83a90958e3a0ed47f5eaf</a></p>
3.4a-f Stakeholder Complaints, Grievances	Conformance	Internal and external consultation mechanisms have been established by the Entity which include Workers' Councils and 'whistleblower' hotlines. Detailed information is available on the Entity's

CRITERION	RATING	COMMENT
and Requests for Information		website and in the Entity's Code of conduct. Complaints can be made through the Entity's webpage at: <a href="https://constantiaflexibles.gan-compliance.com/p/Speakup?locale=en-US">https://constantiaflexibles.gan-compliance.com/p/Speakup?locale=en-US</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's parent company provides Life Cycle Assessments (LCAs) which have been developed using a semi-automated approach, based on the product and product data of the relevant plant. The Entity's clients receive product-specific LCAs.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity provides clearly presented product LCAs for its clients that cover both 'cradle-to-gate' as well as 'cradle-to-grave' scenarios. Publicly available information is provided in the Group Sustainability Report accessible at: <a href="https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf">https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable as the Entity does not engage in any Product development activities.
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	100% of the Entity's process Scrap is collected, quantified, systematically recorded and recycled by sale to external recycling companies. The Entity does not however separate Aluminium alloys and grades for recycling.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	Clear targets exist for the on-site recycling, achievements are reported in the monthly waste reports. All Aluminium waste suitable for recycling is pressed, stored and sold in form of Aluminium blocks. The Entity inform its clients on options to influence the recycling rate through Product design and providing additional information on their products. Further information is accessible at: <a href="https://www.cflex.com/sustainability/product-sustainability/recyclable-packaging/">https://www.cflex.com/sustainability/product-sustainability/recyclable-packaging/</a> and at: <a href="https://www.cflex.com/sustainability/">https://www.cflex.com/sustainability/</a>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is involved in industry-spanning projects and initiatives such as 'CEFLEX', which works towards the development of collection, sorting and reprocessing infrastructure for post-consumer flexible packaging across Europe.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity communicates its Greenhouse Gas (GHG) Emissions and Energy reduction achievements on its website at: <a href="https://www.cflex.com/sustainability/">https://www.cflex.com/sustainability/</a>  Information on GHG Emissions is also provided in the publicly available Group annual Sustainability Report accessible at: <a href="https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf">https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf</a>  Data on Emissions are also communicated to public authorities and to platforms including EcoVadis and the Carbon Disclosure Project (CDP) who verify and evaluate these data. Information is available in the annual ESG Report accessible at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroo">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroo</a>

CRITERION	RATING	COMMENT
		<a href="https://www.cfex.com/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">m/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles ESG Report 2023.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has committed itself to reduce CO<sub>2</sub> Emissions by 24% by 2030 and 49% by 2049. The Entity monitors its Energy and GHG Emissions within its ISO 50001 Energy Management System, through Energy audits and submitting VOC reports. Data can be found on the website: <a href="https://www.cfex.com/sustainability/corporate-sustainability">https://www.cfex.com/sustainability/corporate-sustainability</a> and in the ESG Report:</p> <p><a href="https://www.cfex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cfex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles ESG Report 2023.pdf</a></p> <p>Whilst the Entity has developed a GHG emission reduction plan and ensures a GHG emission reduction pathway that is consistent with a global warming scenario of less than 1.5°C, it however does not currently follow the methodology as endorsed by the ASI.</p>
5.4 GHG Emissions Management	Conformance	The Entity's parent company has developed and implemented a Corporate Value Chain Accounting System for Scope 1, 2 and 3 Emissions following the GHG protocol for each plant including the Entity, which is externally peer-reviewed on an annual basis. Analysis and reduction targets for Emissions are set and reduction programs established as part of the environmental management program, which are included in the ISO 50001:2018 certification.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>All Emissions to Air are measured and reported to local authorities. Emission reduction plans have been developed by the Entity and are approved by local authorities. Information is reported in the annual ESG Report, accessible at:</p> <p><a href="https://www.cfex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cfex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia Flexibles ESG Report 2023.pdf</a></p>
6.2a-g Discharges to Water	Conformance	Water is discharged within legal approvals. Water reduction targets have been defined and progress is monitored.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Emergency plans for risks relating to Spills are available, and employees are trained in these plans. Internal audits are conducted to identify leakages. Crisis management procedures include relevant environmental emergency.



CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Emergency plans for risks relating to Spills are available, and employees are trained in these plans. Crisis management procedures include relevant environmental alarms with information provided to local authorities and the local community according to severity of the incident. Spills are reported in the Entity's Environmental Management System, and actions are documented in Corrective and Preventative Actions (CAPA) for management review. Authorities are always informed in the case of contamination occurring on a larger scale.
6.5a-c Waste Management and Reporting	Conformance	The Entity operates a Waste management system in accordance with Waste management principles. Clear reduction targets according to the collection of Hazardous and Non-Hazardous Waste exist, and Key Performance Indicators (KPI)s are defined. The Entity has adopted Waste as a KPI which is monitored continuously. Data are reported to the authorities and is publicly available in the ESG Report accessible at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a>
6.6a-g Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	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	The Entity monitors its water consumption in its periodic Management review. Water use is limited to sanitary purposes, with no water used in the production process, and no Material risks to water have been identified.
7.2a-e Water Management	Not applicable	This Criterion is not applicable to the Entity as water related risks for the Facility are assessed as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has had an external Biodiversity status survey conducted. The survey identified the Entity has no significant negative impact nor influence on Biodiversity outcomes. The Entity is not located within protected areas such as Natura 2000.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the external Biodiversity assessment determined the Entity's impact is low. There 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 external Biodiversity assessment determined the Entity's impact is low. Opportunities for improvement are managed and implemented via a systematic Continuous Improvement Program (CIP).

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services impacts were identified.
8.4 Alien Species	Conformance	A Biodiversity assessment was conducted by an external consultancy. Due to the how products and materials are sourced by the Entity, the risk of introduction of Alien Species by the Entity is low.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has no operations in or adjacent to any World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as there are no Protected Areas (e.g. Natura 2000) in the Entity's Area of Influence.
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	Conformance	<p>The Entity's parent company commits the Entity, to compliance with Human Rights in its Code of Conduct. The Entity's parent company is a founding member of ASI and works to extend this approach in its supply chain. The Entity conducts an annual Discrimination report and is audited on a regular basis against SEDEX/SMETA.</p> <p>A Gender Analysis was reported in the 2023 ESG Report and Gender related targets are set in the Entity's ESG Commitments. Information on Diversity &amp; Equal Opportunity ESG Commitments are accessible at: <a href="https://www.cflex.com/sustainability/esg-commitments/">https://www.cflex.com/sustainability/esg-commitments/</a></p> <p>The Gender Analysis in the 2023 ESG Report is accessible at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity commits itself through its Code of Conduct to the prohibition of Discrimination and Harassment. Equal opportunities are integral to the Entity's Human Resources Strategy. The Entity provides an annual anti-Discrimination report made available to employees. The Code of Conduct is accessible at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous People 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 People 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.

CRITERION	RATING	COMMENT
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 People in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous People in the Entity's Area of Influence and no cultural or sacred heritage is affected by the site.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous People in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as no former, current or planned resettlement occurs.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is in close contact with surrounding communities. Most of the Entity's employees reside in the local area. Stakeholders and their interests have been identified and mapped as part of the Entity's ISO 9001 & 50001 certification.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity conducts Supplier self-questionnaires and has confirmed the application of the Supplier Code of Conduct. Supplier audits are undertaken regularly. All Aluminium Suppliers are ASI Certified and Supplier Certificates are regularly checked on the ASI homepage.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity conducts Supplier self-questionnaires and regularly audits Suppliers. The audit results are used for Supplier development. The supply chain assessment process for Conflict-Affected and High-Risk Areas (CAHRAs) did not identify any significant risks.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity conducts Supplier self-questionnaires and regularly audits Suppliers. The supply chain assessment process for CAHRAs did not identify any significant risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity conducts Supplier self-questionnaires and has confirmed the application of the Supplier Code of Conduct. All Aluminium Suppliers are ASI Certified. Supplier audits are undertaken regularly and the audit results are used for Supplier development. Existing Supplier ASI Certificates are checked on the ASI homepage.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has conducted Supplier audits and Supplier self-questionnaires. To date the Entity has identified no 'hazard signals' in the supply chain and the Entity maintains good relationships with all material Suppliers. Reporting of the supply chain due diligence is included in the ESG Report accessible at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a>
9.9 Security practice	Not Applicable	This Criterion is Not Applicable as the Entity does not utilise a security service or armed personnel.

## 10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity commits itself to respect Workers' rights in its Code of Conduct and requests the same of its Suppliers. The Entity's workforce has not currently appointed nor elected a representative. The Code of Conduct is accessible at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a>
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 Freedom of Association and Collective Bargaining are not restricted in Germany.
10.2a-c Child Labour	Conformance	Child labour is prohibited in Germany. Young Workers (from the age of 15 to 18) are under special protection within the apprenticeship program and are not allowed to work in hazardous working environments. The Entity commits itself, and expects its Suppliers, to comply with the prohibition of child Labour through its Code of Conduct accessible at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0">https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0</a>
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.  All employees are either employed directly or through recognized labour agencies, providing all necessary documentation of the employees. Workers are either German citizens or have permanent working and living rights in Germany. No deposits or security payments are permitted. There is no restriction of Workers' movement at the site.  The Code of Conduct and associated Modern Slavery and Human Trafficking Statement is accessible at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a>
10.4a-c Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or support Discrimination nor any other condition that could give rise to Discrimination. This was confirmed through interviews and document review. The Entity states in its Code of Conduct that Discrimination is neither tolerated at the site nor at its Supply Chain. The Entity also prepares an annual anti-Discrimination report.
10.5 Communication and engagement	Conformance	Direct and frequent communication between Workers, the Entity's management and the Human Resources function is established. A positive working climate and direct communication were mentioned by Workers interviewed in the Audit.
10.6a-g Violence and Harassment	Conformance	The Entity states in the Code of Conduct that it does not tolerate any form of punishment or Harassment. It requires its Suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of Worker representation. The Code of Conduct is accessible at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a>

CRITERION	RATING	COMMENT
10.7a-c Remuneration	Conformance	Wages are regulated through the Collective Bargaining Agreement for the sector. The Entity provides additional financial and non-financial benefits for employees. All payments are documented and submitted at the end of the month to Workers' bank accounts.
10.8a-c Working Time	Conformance	Working hours are recorded electronically. Working hours are controlled and are in accordance with German worktime law.
10.9a-b Informing Workers of Rights	Conformance	Interviews confirmed the Entity's Workers are informed on Human and Labour Rights during the onboarding process and through direct information provided by the Works Council.

## 11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a documented Occupational Health and Safety (OH&S) Management Systems comprising of Occupational Health and Safety Policies, procedures and records.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Relevant KPIs are monitored and documented by the Entity and published in the Sustainability Report which is accessible at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p> <p>However, a comparative analysis of performance with peers and leading practices is not publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity involves employees in safety audits and in the reporting of unsafe conditions. The Entity holds quarterly safety meetings with department heads and senior management.

### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 January 2025	Initial Certification Audit – Full Certification