

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Thöni Deutschland GmbH

CERTIFICATE NUMBER

438

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE

18 FEBRUARY 2025

DATE OF EXPIRY

17 FEBRUARY 2028

CERTIFIED SINCE

18 FEBRUARY 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a horizontal line.

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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*

CERTIFICATION SCOPE

Production of extrusion billets from
Recycled Aluminium Scrap at Thöni
Deutschland GmbH Facility located
in Kempten, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Thöni Deutschland GmbH
ENTITY NAME	Thöni Deutschland GmbH
CERTIFICATION SCOPE	Production of extrusion billets from Recycled Aluminium Scrap at Thöni Deutschland GmbH Facility located in Kempten, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">25 – 27 November 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 January 2025
AUDIT SCOPE	<p>The Audit Scope included the production of extrusion billets from Recycled Aluminium Scrap at Thöni Deutschland GmbH Facility located in Kempten, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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	18 February 2025 - 17 February 2028

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DATE 17 February 2028

CERTIFICATE NUMBER 438



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

Thöni Deutschland GmbH (the 'Entity') is based in Kempten / Allgäu, Germany and produces approx. 60,000 tonnes of aluminium extrusion billets annually. The majority of the quantity produced is processed into extrusion profiles within the Thöni Group (Thöni Gruppe), which is headquartered in Telfs, Austria. The remelting plant was commissioned in 1995 and is situated in the industrial zone of Kempten.

With around 60 employees, billets with diameters of 152 mm to 305 mm and lengths of up to 7,100 mm are produced in largely automated production plants. The main raw material for this is around 80% aluminium scrap. Using the hot-top process, aluminium billets of the 6000-series are produced with the addition of primary aluminium and other alloying elements. In close cooperation with the development department of the Thöni Group, the alloys and production processes are continuously developed according to customer requirements in the aluminium and automotive components sector taking into account environmental protection and sustainability.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Based on the implemented and integrated Management systems, The Entity has implemented a Legal compliance Management System, which is based on its Integrated Management Systems, ISO 14001 and ISO 45001 and the certified ISO 50001 standard. The Entity's CEO has the overall responsibility for legal compliance. Qualified legal advisers support the legal and obligation database.
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption Guideline (Anti-Korruptions-Richtlinie) and has communicated it internally and externally at: https://www.thoeni.com/downloads https://www.thoeni.com/wp-content/uploads/2024/11/Anti-Korruptions-Richtlinie.pdf</p> <p>The risk of Corruption is analysed, evaluated, and periodically reviewed. Employees are informed of the Code of Conduct and Anti-Corruption guidelines during recruitment and on-boarding.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Thöni Compliance Code (Code of Conduct) that includes principles relevant to environmental, social and governance performance. The Code of Conduct is publicly available at: www.thoeni.com/en/Downloads</p> <p>It is revised at least every five years according to internal processes, or by Management Review.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has issued several corporate Policies (quality, environment, energy, work and safety) addressing Environmental, Social, and Governance (ESG) topics which are communicated internally via the Document Management System, and available at: https://www.thoeni.com/en/downloads</p> <p>The Policies are periodically reviewed, and training is provided to Workers where applicable.</p>
2.2a-c Leadership	Conformance	The managing directors of Thöni Group and the Site Manager are responsible for implementing and maintaining the ASI Management System.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an integrated Management system covering Quality, Environmental Protection and Occupational Safety. The Entity holds a valid ISO 14001 certificate.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an integrated Management system covering Quality, Environmental Protection and Occupational Safety. The Entity holds valid ISO 9001 and ISO 50001 certificates. Social aspects covering Human Rights were included in the integrated risk analysis and derivation of opportunities.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy (Lieferkettenstrategie für Konflikt und Hochrisikogebiete) covering

CRITERION	RATING	COMMENT
		environmental, social and governance issues, available at: https://www.thoeni.com/en/downloads
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity, as there have been no Major Changes since the Entity has been an ASI Member, and there are no changes currently in progress. Nevertheless, the Entity has a process to conduct Environmental and Social Impact Assessments for New Projects or Major Changes to existing Facilities. The process will be reviewed at least every five years via the document Management System. This process will be applied as part of the new foundry project.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity, as there have been no Major Changes since the Entity has been an ASI Member, and there are no changes currently in progress. Nevertheless, the Entity has a process to Conduct a Human Rights Impact Assessment, including a gender analysis, for New Projects or Major Changes to existing Facilities. This process will be implemented as part of the new foundry project, which is the planning phase. The processes and results of Impact Assessments will be reviewed at least every five years or in case of any Major Changes.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented Emergency Response Plans which are regularly reviewed. The Emergency Response Plans are made available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity has implemented processes and Emergency Response Plans that are based on overall risk assessments that take into account Material adverse environmental, social and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has implemented processes that are based on an overall risk assessment that takes into account Material adverse environmental, social and governance impacts in case of any major business changes.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has implemented processes and Emergency Response Plans based on an overall risk assessment that takes into account Material adverse environmental, social and governance impacts. The plans are activated in case of any changes in business activity. The processes and risk analysis are reviewed at least every five years and in case of Major Changes.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainability Reporting function is incorporated in their parent company Thöni Gruppe. The Entity has issued a 2023 Sustainability Report to report on its governance approach and its Material environmental, social, and economic impacts on the audited Entity. The Report is based on Global Reporting Standards (GRI) Standards. The Report is publicly disclosed at: www.thoeni.com/en/downloads
3.2 Non-compliance and Liabilities	Conformance	The Thöni Group has publicly disclosed a Sustainability report in accordance with the GRI reporting standards (GRI 2-27). It is

CRITERION	RATING	COMMENT
		confirmed that no significant violations of laws and regulations led to the imposition of a fine as disclosed in the Sustainability Report 2023, page 80: www.thoeni.com/en/downloads
3.3a-c Payments to Governments	Conformance	The Entity has publicly disclosed and confirmed in the Sustainability Report 2023 (page 79) that no payments are made to Governments or political parties: www.thoeni.com/en/downloads
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Complaints Resolution Mechanism. No complaints have been received to date. The Entity reports on complaints received in the Sustainability Report 2023, page 76: www.thoeni.com/en/downloads The Whistleblowing System is available at: https://thoeni.iwhistle.de
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	In conjunction with an external consultant, the Entity has completed a Life Cycle Assessment (LCA) for all the alloy groups used. The LCA is based on the methodology of ISO 14044 for LCAs and EN 15804+A2.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has established a procedure to provide appropriate LCA information to customers upon request.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented processes for the physical separation of different alloys and grades of Aluminium. All Scrap is recycled. The effectiveness of these processes was observed during the site tour. The Entity has a program to recycle 100% of its Aluminium Process Scrap within its production or with external partners for Dross.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity strives to keep the Scrap content in their alloys as high as possible, as it is their business purpose to be an active part of the Aluminium recycling loop. Thöni Gruppe is a member of Aluminium Deutschland (https://www.aluminiumdeutschland.de) and WV-Metalle (https://www.wvmetalle.de) which engages in the recycling and collection of Aluminium at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity accounts for and publicly discloses its Material Greenhouse Gases (GHG) emissions and energy use by source on an annual basis. Greenhouse gas emissions are quantified and published in the Sustainability Report 2023, page 46: www.thoeni.com/en/downloads Site-specific data for Scope 1, Scope 2 and Scope 3 (direct and indirect emissions) is included in the Greenhouse gas report (Treibhausgas Bericht), available at: https://www.thoeni.com/wp-

CRITERION	RATING	COMMENT
		content/uploads/2024/12/QW-LS_241202-114037-1c0f_Nachtrag_NHB2023_DE.pdf
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 defined specific reduction targets as part of its annual environmental/energy program. The program is reviewed annually internally and by an auditor from an accredited certification body. GHG emissions reduction targets (Scopes 1 -3) are published in the 2023 Sustainability Report, pages 49-51: www.thoeni.com/en/downloads</p> <p>The addendum to the Sustainability Report (Nachtrag zum Nachhaltigkeitsbericht 2023) includes the result using the ASI Methodology Tool was published demonstrating the ASI Pathway with Intermediate Targets to 'net zero': https://www.thoeni.com/wp-content/uploads/2024/12/QW-LS_241202-114037-1c0f_Nachtrag_NHB2023_DE.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an Energy Management System according to ISO 50001 and continuously improves the reduction of emissions and energy use such as recycling the waste heat from natural gas combustion exhaust gas, installing photovoltaic power generation equipment, and purchasing Green Electricity.</p> <p>The certificate is available at https://www.thoeni.com/en/downloads</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has publicly disclosed its Emissions to Air and plans to reduce these emissions in the Sustainability Report, pages 52-53: www.thoeni.com/en/downloads</p>
6.2a-g Discharges to Waters	Conformance	<p>The Entity does not discharge any wastewater into bodies of water. Wastewater is discharged via the sewer system without exception and in accordance with the permit. The Entity has disclosed their Discharges to Water in its Sustainability Report, page 32: www.thoeni.com/en/downloads</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an assessment of major risk areas of operations where Spills and Leakages could contaminate air, water and/or soil with its Environmental risk assessment. Several emergency plans were documented.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has assessed major risk areas of operations where Spills and Leakages could contaminate air, water and/or soil with its Environmental risk assessment. Several Emergency Response Plans have been documented, including how to inform emergency</p>

CRITERION	RATING	COMMENT
		<p>organisations and interested parties. No Spills and Leakages were reported for 2023.</p> <p>Refer to the Sustainability Report, page 35 in chapter "Management of significant waste related impacts" related to GRI 306-2, at: https://www.thoeni.com/en/downloads/</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste-related impacts have been assessed in accordance the local law and the Entity has implemented a waste management strategy based on the Waste Mitigation Hierarchy. The Entity has publicly disclosed the quantity of its generated waste (hazardous and non-hazardous) in the Sustainability Report, pages 38-39: www.thoeni.com/en/downloads</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity collects all Dross and sends it to an authorized Dross reconditioner. Recovered Aluminium is returned to the plant and reused. The Management program has measures to improve Dross residue treatment.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has assessed water-related risks in Watersheds. The risk analysis did not identify significant risks. Data on water usage are publicly available in the Sustainability Report, pages 31-32: www.thoeni.com/en/downloads</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the water-related risk assessment was rated as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has engaged an external consultancy firm to assess the risk to, and potential impacts on Biodiversity and Ecosystem Services resulting from the land use and activities within the Entity's Area of Influence. In relation to the site and the direct Area of Influence, only adverse effects with a low/short-term impact or with no impact at all were identified. The potential impact on Biodiversity has been assessed as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity assessment rated the risks to Ecosystem Services as low.
8.2a-g Biodiversity Management	Conformance	<p>The potential impact on Biodiversity has been assessed as low. Despite the lack of significant impacts, a Biodiversity Action Plan was developed based on the recommendations of the Biodiversity Risk Analysis Report and published in the Sustainability Report. Implemented actions from the action plan are publicly available in the</p>

CRITERION	RATING	COMMENT
		2023 Sustainability Report, page 43: https://www.thoeni.com/en/downloads
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity Risk Analysis Report prepared by the external consultancy confirmed there are no Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity works to prevent and mitigate the introduction of Alien Species. The Biodiversity plan outlines measures for the maintenance management of green spaces, which also has a positive effect on the containment of small populations of Goldenrod (a species of flowering plants). More information is available in the Sustainability Report 2023, page 43: https://www.thoeni.com/en/downloads
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located in or near World Heritage Properties, as confirmed by the site visit and the UNESCO World Heritage Map (see https://whc.unesco.org/en/statesparties/de). The Entity has implemented a process to ensure these sites are excluded from any future activities.
8.6a-d Protected Areas	Conformance	The Entity is not located in, or in the vicinity of Protected Areas, as confirmed by an external Risk Analysis expert and the Biodiversity Information System for Europe. (https://biodiversity.europa.eu/countries/germany)
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented the Thöni Compliance (Code of Conduct) and Code of Conduct (Compliance-Ordnung /Verhaltenskodex) and Supply Chain strategy (Lieferkettenstrategie Konflikt- und Hochrisikogebiete) with a commitment to respect Human Rights and supply chain Due Diligence, available at: https://www.thoeni.com/en/downloads The Entity has established a process to conduct also Human Rights Due Diligence within the context analysis of the integrated Management System for the whole supply chain. The supplier management process describes the risk analysis with separate identification of Human Rights risks in the supply chain. When a risk is identified, a process is implemented to manage the risk. There were no significant risks identified and is publicly disclosed Sustainability Report 2023, page 80: https://www.thoeni.com/wp-content/uploads/2024/10/THOENI_Nachhaltigkeitsbericht_2023_EN.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a process for the equality of women's rights, non-Discrimination and a guideline on the prevention of Discrimination, Violence and (sexual) Harassment (Richtlinie gegen Diskriminierung, Gewalt, (sexueller) Belästigung) and the Thöni Compliance (Code of Conduct), where women's rights are addressed

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		<p>and actions in case of any suspicion of Discrimination, all these documents are available at: https://www.thoeni.com/downloads</p> <p>In addition, the Entity has a declaration for Gender Equality and Strengthening Women's Rights (Gleichstellung und Frauenrechte). The Entity has conducted a risk analysis of equality women's rights and non-Discrimination and implemented measures. Related disclosures are available in the Sustainability Report 2023, pages 90-91: https://www.thoeni.com/en/downloads</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories and resources that are directly affected by their activities.
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 or their lands, territories and resources that are directly affected by their activities.
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 or their lands, territories and resources that are directly affected by their activities.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as they are located in an extensive industrial area. There are no cultural heritage, and sacred sites in the direct sphere of the Entity's activities as confirmed via UNESCO World Heritage Centre: https://whc.unesco.org/en/statesparties/de
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion does not apply to the Entity, as the Due Diligence (context analysis) in the area of Human Rights has shown that there are no impacts on Local Communities. The Entity has been located in an extensive industrial area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements are being considered or have taken place since joining the ASI or are expected to take place during the certification period.
9.7a-h Affected Populations and Organisations	Conformance	The results of the Human Rights Due Diligence assessment confirmed that there are no significant impacts on Local Communities and therefore no need for action. The Entity is located in a large industrial area that has been in operation for decades. General information about changes to plans is published in the Sustainability Report 2023 is publicly disclosed, pages 79-80: https://www.thoeni.com/en/downloads
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Supply chain strategy for conflict and high-risk areas (Lieferkettenstrategie Konflikt- und Hochrisikogebiete) which is actively addressed to Primary Aluminium suppliers: https://www.thoeni.com/en/downloads

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		A process for risk-based Due Diligence for its Aluminium supply chain includes systematic identification and assessment of risks in the supply chain. Responsibility for supply chain Due Diligence is assigned within the Thöni Group.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a process for risk-based Due Diligence for its Aluminium supply chain which includes systematic identification and assessment of risks in the supply chain for Primary Aluminium and Aluminium Scrap.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's parent company (Thöni Group) has implemented a process for risk-based Due Diligence for its Aluminium supply chain which includes systematic identification and assessment of risks in the supply chain. A strategy to respond to identified risks is established by the parent company.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Performance Standard Initial Certification Audit in November 2024 fulfilled the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports annually on supply chain Due Diligence. Relevant documents include the Supply chain strategy-Conflict and High-Risk Areas (Lieferkettenstrategie-Konflikt- und Hochrisikogebiete), the Declaration on responsible procurement (Erklärung zur verantwortungsvollen Beschaffung) which are publicly disclosed at: www.thoeni.com/en/Downloads
9.9 Security practice	Conformance	The Entity operates 24 hours a day, 7 days a week, and only external inspections are undertaken by the unarmed security service. The security service is not located permanently on site, they only do roadside patrols in the industrial area where the Entity is located. The Code of Conduct for Suppliers was signed by the service security provider.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity is committed to an honest and fair dialogue with employee representatives and safeguards the Freedom of Association of its Workers. An open exchange of opinions, criticism and ideas is encouraged according to Thöni Compliance (Code of Conduct), page 10: https://www.thoeni.com/en/downloads There is a Works Council, and a company agreement implemented within the Entity.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the right to Freedom of Association and Collective Bargaining is not restricted in Germany.
10.2a Child Labour	Conformance	As confirmed by interviews with Workers and management, the Entity does not employ minors under the age of 15 years. The Entity has implemented practices to ensure that children are not employed. The youngest worker employed was over 18 years old at the time of the

CRITERION	RATING	COMMENT
		Audit. The Thöni Compliance (Code of Conduct) addresses the prohibition of Child Labour, page 10: https://www.thoeni.com/en/downloads
10.3a-c Forced Labour	Conformance	<p>The Entity does neither engage in, nor support the use of Forced Labour, either directly, or through any employment or recruitment agencies. This was confirmed via a site observation, document review, and interviews with Workers and management.</p> <p>To prevent the occurrence of Forced Labour, the Entity has established the Code of Conduct (Thöni Compliance), the Code of Conduct for Business Partners (Thöni Verhaltenskodex für Lieferanten), and the Declaration on Modern Slavery 2024 (Erklärung zur modernen Sklaverei 2024).</p> <p>All documents available at: https://www.thoeni.com/en/downloads</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in the Code of Conduct (Thöni Compliance). The Entity's risk assessment addressed Discrimination and there is no Discrimination in pay for equal work. This was confirmed by interviews, and there are no indicators of Discrimination by the Entity.</p> <p>A management programme for equality, women's rights and non-Discrimination has been implemented and a KPI for measuring equality, women's rights and non-Discrimination has been implemented and is tracked in the management review. A Guideline for the Prevention of Discrimination, Violence and Harassment (Richtlinie gegen Diskriminierung, Gewalt, Belästigung) is available at: https://www.thoeni.com/en/downloads</p>
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity ensures open communication and direct engagement with Workers. The Managing Director has an 'open-door' policy so employees can speak directly to them at any time. Nominated Workers function as safety representatives, a joint Health and Safety committee is established and an anonymous letter box for raising suggestions or concerns is available. Workers meet daily with their superiors to discuss work-related issues.
10.6a-g Violence and Harassment	Conformance	As confirmed by interviews and a document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers. The Entity has established and provided training on the following documents regarding Violence and Harassment, the 'Directive on the prevention of Discrimination, Violence and (sexual) Harassment' (Richtlinie zur Verhinderung von Diskriminierung, Gewalt und (sexueller) Belästigung) which describes how to report and react in case of any Discrimination, is available at: https://www.thoeni.com/en/downloads
10.7a-c Remuneration	Conformance	The Entity respects the rights of Workers to receive a living wage and ensures that wages paid for the normal working week meet industry standards. This was confirmed via document review and worker interviews. Payments are made via transfer to employees' bank accounts and pay slips are provided to employees, which are detailed and legible. Overtime and allowances payments are regulated in the company agreement, with a premium of at least 25%. The procedure

CRITERION	RATING	COMMENT
		for determining Remuneration is disclosed in the Sustainability Report 2023, page 77: https://www.thoeni.com/en/downloads
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law on Working Time, public holidays, and paid annual leave. Overtime is voluntary due to the limited shift system. The average Working Time of production is based on 40 hours per week and is monitored via the electronic time recording system. This was confirmed through interviews and reviewed documents.
10.9a-b Informing Workers of Rights	Conformance	As confirmed through interviews and document review, Workers receive training regarding Occupational Health and Safety (OH&S) and also about labour law during induction training and through the annual refresher training. Relevant laws are displayed in the appropriate places in the Entity, and Entity-wide meetings are held. All internal guidelines and specifications are communicated via the workflow system of the document Management System.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001 as an extension of the existing Integrated Management System in accordance with ISO 9001 and ISO 50001. The integrated Management System meets all relevant aspects of OH&S Management.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Integrated Management system is reviewed annually and information on OH&S such key figures and information on OH&S (page 56), on Basic Safety Training (page 59) and work-related injuries (pages 65-67) are disclosed in the Sustainability Report 2023: https://www.thoeni.com/en/downloads</p> <p>Based on data published in the Sustainability Report, a benchmarking exercise is undertaken with key competitors and data from Berufsgenossenschaft Holz und Metall (BGHM's) (an employers' liability insurance associations) benchmark of Key Performance Indicators are published in the supplement to the Sustainability Report 2023 (Nachtrag zum Nachhaltigkeitsbericht 2023) available at: https://www.thoeni.com/en/downloads</p>
11.2 Employee engagement on Health and Safety	Conformance	Central Safety Committee meetings are held quarterly, the Committee is regulated by law and is the internal platform for the systematic processing of OH&S issues. In addition to the preventive services, the management, works councillors, disability and safety representatives, and various internal and external safety representatives are also involved. Furthermore, special training courses and inspections are undertaken by an external safety expert. All Workers can issue 'safety notices' to inform management on perceived safety issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 February 2025	Initial Certification Audit – Full Certification
