

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Constantia Nusser

CERTIFICATE NUMBER
444

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
11 APRIL 2025

DATE OF EXPIRY
10 APRIL 2028

CERTIFIED SINCE
11 APRIL 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

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

The conversion of basic Aluminium
to final conversion by printing,
cutting, lasering and punching
Aluminium foils at Constantia
Nusser, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constantia Flexibles International GmbH
ENTITY NAME	Constantia Nusser
CERTIFICATION SCOPE	The conversion of basic Aluminium to final conversion by printing, cutting, lasering and punching Aluminium foils at Constantia Nusser, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material ConversionOther Manufacturing or sale of products containing Aluminium
ASI STANDARD	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">3 – 4 December 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 February 2025
AUDIT SCOPE	<p>The Audit Scope included the conversion of basic Aluminium to final conversion by printing, cutting, lasering and punching Aluminium foils at Constantia Nusser, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material ConversionOther Manufacturing or sale of products containing Aluminium <p>All relevant 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 11 April 2025 – 10 April 2028

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DATE 10 April 2028

CERTIFICATE NUMBER 444



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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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 Nusser GmbH (the 'Entity'), based in Wangen im Allgäu in Germany, employs 100 people and produces packaging for the food and pharmaceutical industries. The company was founded in 1923 and has been part of the Constantia Flexibles Group since 1981. The value chain includes printing, cutting, die-cutting and lasering of Aluminium packaging, of which 27 million square metres (m²) of finished product was produced in 2024. The primary destination of products is predominantly Germany, Switzerland, Austria and other European markets.

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	Medium	High	HIGH
RISKS	High	Medium	High	HIGH
PERFORMANCE	High	Medium	High	HIGH
OVERALL			HIGH	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has conducted controlled self-assessments on an annual basis, which are checked by the Constantia Flexibles Group on the fulfillment of all legal requirements. Risk based questionnaires are used.
1.2 Anti-Corruption	Conformance	The Entity has a well-established system to fight Corruption, including Bribery, in all its forms. An anti-Corruption guideline is in place and employees are required to participate in web-based training and complete related assessments. A global 'whistleblowing' hotline is in place.
1.3a-e Code of Conduct	Conformance	The Entity has 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; and in the internal version, contact persons are communicated. The Code of Conduct is available at: https://www.cflex.com/general-terms-conditions/code-of-conduct
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has an integrated Management System for environmental, social and governance compliance, with implementation supported by the Entity's management team. Policies include the Code of Conduct, the Environment Policy, and the Health, Safety, Security and Environment Policy. Policy implementation is monitored through an internal auditing system including a self-assessment of the Entity and additional risk-based audits undertaken by Constantia Flexibles Group as required. The effectiveness of the Management System is reviewed during annual Management Reviews and all strategic documents and policies are reviewed every three years. Policies are communicated to staff via electronic screens and the online Sharepoint, and externally at: https://www.cflex.com/sustainability
2.2a-c Leadership	Conformance	The Entity has nominated the site management as the responsible person for the implementation of the ASI Performance Standard and conformance with the Standard. The role receives support from Constantia Flexibles headquarters.
2.3a Environmental and Social Management Systems – Environmental	Minor Non-Conformance	The Entity has an Integrated Management System, which includes most components of an Environmental Management System (EMS). However, the Integrated Management System does not include an environmental risk assessment or impact assessment and the site-specific environmental programme could not be demonstrated.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System that is regularly audited against SEDEX/SMETA standards. Additionally, there are two Workers' Councils in the Entity (for the 'production' and 'office' Workers).

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity is highly committed to responsible sourcing, 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 a Forestry Stewardship Council (FSC) Chain of Custody certification.</p> <p>Responsible sourcing is implemented at both a Constantia Flexibles Group and Constantia Nusser level through supplier assessments and an emphasis on its suppliers to implement the ASI Standards. The Entity's Ethical Sourcing Policy is available at: https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&tx_dwboilerplate_cflex%5Bfile%5D=1515&cHash=2fc052d571f246766aaf7930426dc245</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects of Major Changes to the existing Facility. The Entity's social impact is addressed through the 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 of Major Changes to the existing Facility. The Entity's social impact is addressed through the SEDEX/SMETA certification, which includes gender analysis, and Health and Safety assessments.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented well managed Emergency Response Plans. These include crisis organisation, communication guidelines, assessments of the insurance company, yearly training and quarterly risk analysis. Plans and measures for risk prevention are available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Constantia Flexibles Group maintains a Business Resilience Plan for all sites, including the Entity. A holistic risk evaluation (a 'Risk Run') is conducted by the Global Risk Manager twice a year. Senior management reviews the results of the risk evaluation and the defining measures.
2.9a-b Mergers and Acquisitions	Conformance	All mergers and acquisitions, including the Due Diligence process, are managed by the Constantia Flexibles Group. Group procedures exist, the Due Diligence process is managed and organized by CFlex. All regulations are valid for the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	All closures, decommissioning and divestment processes are managed by the Constantia Flexibles Group, which has established relevant Policies for the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>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. The Constantia Flexibles ESG Report 2023 is available at: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</p>

CRITERION	RATING	COMMENT
		The Constantia Flexibles Group data are also publicly available in the sustainability reporting of Wendell (the Entity's parent company at the time), Wendel Universal Registration Document 2022, page 214: https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has implemented the Constantia Flexibles Group's system of auditing and self-assessment to avoid legal non-compliances and liabilities. No fines or other liabilities for non-compliances were received in the reporting period. Any non-compliances or liability would be reported in the Constantia Flexibles ESG Report, available at: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf
3.3a-c Payments to Governments	Conformance	The Entity has implemented a system of Policies and procedures regarding anti-Corruption and Bribery. A detailed system of reporting and internal audits is in place to guarantee compliance. The system is described in the Code of Conduct: https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&tx_dwboilerplate_cflex%5Bfile%5D=850&cHash=47c8fda4b17e893a7fbb9e75145d9de The Code of Conduct for Suppliers and Subcontractors is available at: https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&tx_dwboilerplate_cflex%5Bfile%5D=851&cHash=b971265fb5a83a90958e3a0ed47f5eaf According to the Policies and Codes of Conduct, the Entity does not make any payments to governments.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	Internal and external consultation mechanisms have been established by the Entity, including Workers' Councils and 'whistleblower' hotlines. Detailed information is available on the Entity's website and in the Code of Conduct. Complaints can be made through the Entity's webpage at: https://constantiaflexibles.gan-compliance.com/p/Speakup
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Constantia Flexibles Group has developed 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 customers 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 at: https://www.cflex.com/sustainability/corporate-sustainability Additionally, LCA information is included in the sustainability reporting of Wendell (the Entity's parent company at the time), Wendel Universal Registration Document, available at: https://www.wendelgroup.com/sites/default/files/wendel_2020_urd_uk.pdf

CRITERION	RATING	COMMENT
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as it does not engage in any Product development activities.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented clear procedures and work instructions for the separation and collection of Aluminium Scrap. Quantities of Aluminium Scrap and waste are strictly monitored.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity inform its clients how to influence recycling rates through product design and additional information on the product. https://www.cflex.com/sustainability/product-sustainability/recyclable-packaging/</p> <p>The recycling strategy and waste management is included in the ESG Report, page 36: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is involved in industry-wide projects and initiatives such as 'CEFLEX', which works towards the development of collection, sorting and reprocessing infrastructure for post-consumer flexible packaging across Europe.

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity communicates its Greenhouse Gas (GHG) emissions and energy reduction achievements in the ESG Report 2023, available at: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</p> <p>GHG Emissions (Scopes 1, 2 and 3) have been calculated and disclosed at the corporate level. A Third Party conducts assurance of environmental data including GHG Emissions. Data are also communicated to public authorities and to platforms including EcoVadis and the Carbon Disclosure Project (CDP) that verify and rate these data.</p> <p>The Constantia Flexibles Group data are also publicly available in the sustainability reporting of Wendell (the Entity's parent company at the time), Wendel Universal Registration Document 2022: https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf</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	Minor Non-Conformance	The Entity has developed a GHG Emissions Reduction Plan and committed itself to reduce CO ₂ emissions by 24% by 2030 and 49% by 2049 in line with its SBTi targets. The Entity monitors its energy and GHG emissions within its ISO 50001 Energy Management System, through

CRITERION	RATING	COMMENT
		<p>energy audits and submitting Volatile Organic Compounds (VOCs) reports. Data are available on the website and in the ESG Report 2023: https://www.cflex.com/sustainability/corporate-sustainability</p> <p>https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</p> <p>The Entity has used the ASI GHG Pathways Calculation Tool with a 2022 baseline year to ensure its Pathway is consistent with a 1.5°C warming scenario.</p> <p>However, the Entity has not set an emissions intensity based Intermediate Target within five years of the base year.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented a 'Corporate Value Chain Accounting System' for Scope 1, 2 and 3 GHG emissions following the GHG Protocol, which is externally peer-reviewed annually. Analysis and reduction targets for emissions are set and reduction programs established as part of the energy management program of the ISO 50001:2018 certification. The Entity's GHG Management System is integrated in the Constantia Flexibles Group Management System.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	All Emissions to Air are measured and reported to the local authorities. Emission reduction plans have been developed by the Entity and are approved by the authorities. Information is reported in the Constantia Flexibles ESG Annual Report 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf
6.2a-g Discharges to Water	Conformance	There is no significant discharge of process water by the Entity into the local wastewater network. Discharges to Water are managed within the Constantia Flexibles Group environmental Management System. Water is discharged within the legal permissions.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Major risks of Spills and Leakages are identified by the Entity in the site risk assessment. Emergency plans for different categories of risks are available, and employees are trained in these plans. Crisis management includes environmental alarms. The Entity's management plans are available upon request.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Emergency plans for risks relating to Spills and Leakages are available, and employees are trained in these plans. Internal audits are conducted to identify leakages. Crisis management includes environmental alarms with information provided to authorities and the Local Community according to the severity of the incident. Spills are reported in the Entity's environmental Management System, and actions are documented in the Corrective and Preventative Action (CAPA) register for management review. Authorities are informed in the case of contamination issues on a larger scale. There have been no Spills or Leakages at the Entity.
6.5a-c Waste Management and Reporting	Conformance	The Entity's Waste management reporting is addressed via the Environmental Management System (EMS) and in accordance with Waste management principles. Waste is a Key Performance Indicator

CRITERION	RATING	COMMENT
		(KPI), which is monitored continuously. Data are reported to the authorities and is publicly available in the ESG Report 2023, page 36: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf
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 monitored its water consumption as part of its Management Review. Water use is limited to sanitary purposes, and no water is used in the Entity's production process.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risks have been assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has engaged an external specialist to conduct a Biodiversity assessment. The Entity is located within an industrial area and not within Protected Areas such as Natura 2000. The biodiversity assessment determined that the Entity's impact on Biodiversity and Ecosystem Services is low. Whilst the risk is low, recommendations were still identified, and several of the recommendations are currently being implemented.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the 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 biodiversity assessment determined the Entity's impact is low. Whilst the risk is low, recommendations were still identified, and the opportunities for improvement are implemented via a systematic Continuous Improvement Program (CIP).
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 specialist, which determined that, due to how products and materials are sourced, the risk of introduction of Alien Species 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.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	There are no Protected Areas (e.g. Natura 2000) in the area surrounding the Entity or within its 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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity is committed to compliance with Human Rights in the Constantia Flexibles Code of Conduct. The Entity conducts training for all employees through an electronic training tool on Human Rights. Several SMETA audits have been conducted. The Entity's Code of Conduct is available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity commits itself through the Code of Conduct to the prohibition of Discrimination and Harassment. Equal opportunity is integral to the Entity's Human Resources Strategy. The Entity provides an annual anti-Discrimination report that is made available to employees. The Code of Conduct is available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/ The promotion of diversity and equal opportunities is outlined in the ESG Report 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are Indigenous Peoples in the Entity's Area of Influence and no cultural and 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 Peoples in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlement is necessary.
9.7a-h Affected Populations and Organisations	Conformance	The Entity regularly engages with surrounding Communities. Most of the Entity's employees are from the local area. Stakeholders and their interests were identified and mapped as part of the ISO 9001, ISO 50001 and SMETA certifications.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity conducts supplier self-questionnaires and has the application of the Supplier Code of Conduct confirmed. Supplier audits are undertaken regularly and audit results are used for supplier development. All suppliers are ASI Certified, and supplier certificates are regularly checked on the ASI website.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity conducts supplier self-questionnaires and has the application of the Supplier Code of Conduct confirmed. Supplier audits are carried out regularly and the audit results are used for supplier development. All suppliers are ASI Certified, and supplier certificates are regularly monitored on the ASI website.</p> <p>The Entity's supply chain assessment for Conflict-Affected and High-Risk Areas (CAHRAs) did not identify any significant risks.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the supply chain assessment for CAHRAs did not identify any significant risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Certification Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity has reported on its supply chain Due Diligence process in the ESG Report 2023:</p> <p>https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</p>
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity, as there is no security service or armed personnel present at the site.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity commits itself to respect the Workers' rights in its Code of Conduct and requests the same of its suppliers. The Entity has seven elected Workers' Councils. The Code of Conduct is available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/</p> <p>Operating agreements exist with the General Manager, and local waivers can be agreed between plant management and the Workers' Councils.</p>
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 are not restricted in Germany. Operating agreements exist with the General Manager, and local waivers can be agreed between plant management and Workers councils.

CRITERION	RATING	COMMENT
10.2a-c Child Labour	Conformance	<p>Child Labour is prohibited in Germany. Young Workers (15 to 18 years) 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, available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cfex%5Baction%5D=download&tx_dwboilerplate_cfex%5Bcontroller%5D=Cfex&tx_dwboilerplate_cfex%5Bfile%5D=850&cHash=0f742f70dd8237f312e7cc162f7400d0</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>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 recognised 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 Entity's Human Resources department does not hold original documents, only copies of Workers' documents such as identification and passports. The time for announced termination of the working contract is regulated in the Collective Bargaining Agreement of the sector. The Entity's Code of Conduct is available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/</p> <p>However, whilst the last publication of the annual Modern Slavery Statement was in 2022, the requirement for annual disclosure has not been met.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities and does not engage in or supports 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 in its supply chain. The Entity also prepares an annual anti-Discrimination report.</p>
10.5 Communication and engagement	Conformance	<p>Direct and frequent communication between Workers and the representatives of the Workers' Councils is established. A positive working climate and direct communication were mentioned by Workers interviewed during the Audit.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity states in the Code of Conduct, that it does not tolerate any form of punishment and 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 available at: https://www.cflex.com/general-terms-conditions/code-of-conduct/</p>
10.7a-c Remuneration	Conformance	<p>Wages are regulated uniformly by the salary table valid for all employees through the working contracts based on the Collective Bargaining Agreement. The Entity provides additional financial and non-financial benefits for the employees. All payments are documented and submitted at a defined day in the month to the Workers' bank accounts.</p>
10.8a-c Working Time	Conformance	<p>Working hours are recorded electronically and paid together with relevant bonus payments. Working hours are controlled and are in</p>

CRITERION	RATING	COMMENT
		accordance with both the labour management agreement and German law.
10.9a-b Informing Workers of Rights	Conformance	Interviews with Workers and the Human Resources management team during the Audit confirmed that the Entity's Workers are informed on Human and Labour Rights during the onboarding process and direct information through the Workers' 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 OH&S Policies, procedures and records.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	Relevant Key Performance Indicators (KPIs) are monitored and documented by the Entity and published in the ESG Report 2023: https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf However, a comparative analysis of performance with peers and leading practices is not publicly disclosed.
11.2 Employee engagement on Health and Safety	Conformance	The Entity involves operators in safety audits and safety reporting and to report unsafe conditions. Quarterly safety meetings with department heads and senior management are held.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 April 2025	Initial Certification Audit – Full Certification