

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

BORBET Group

CERTIFICATE NUMBER
169

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

DATE OF ISSUE
17 DECEMBER 2024

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
16 DECEMBER 2025

ASI ACCREDITED
AUDITING FIRM

**GUTCERT (AFNOR
GROUP)**

CERTIFIED SINCE
17 DECEMBER 2021

AUTHORISED BY

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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

Manufacture of alloy wheels at BORBET Group facilities including Ranshofen (Austria); Bad Langensalza, Hallenberg-Hesborn, Kodersdorf and Medebach (Germany) and; Port Elizabeth (South Africa), as well as the management related activities at the Corporate Headquarters at the Hallenberg-Hesborn facility.

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

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	BORBET Leichtmetallräder (BORBET Alloy wheels)
ENTITY NAME	BORBET Group
CERTIFICATION SCOPE	Manufacture of alloy wheels at BORBET Group facilities including Ranshofen (Austria); Bad Langensalza, Hallenberg-Hesborn, Kodersdorf and Medebach (Germany) and; Port Elizabeth (South Africa), as well as the management related activities at the Corporate Headquarters at the Hallenberg-Hesborn facility.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion – Principles 1 to 4 (transition)
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (2 – 4 November 2021)Surveillance Audit and Scope Change (10 May 2023)Re-Certification Audit and Scope Change (28 – 31 October 2024)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">2 – 4 November 2021 (Initial Certification Audit)10 May 2023 (Surveillance Audit and Scope Change)28 – 31 October 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">26 November 2021 (Initial Certification Audit)5 August 2023 (Surveillance Audit and Scope Change)23 January 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (2 – 4 November 2021)</u></p> <p>The Audit Scope includes the manufacture of light alloy wheels at seven BORBET manufacturing facilities including Corporate Headquarters at Hallenberg-Hesborn, Germany. The ASI multi-site sampling approach was undertaken to include on-site Audits at Hallenberg-Hesborn and the manufacturing Facility at Kodersdorf (Germany).</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion (Industrial Users) <p>All Criteria from Principle 4 Material Stewardship in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit and Scope Change (10 May 2023)</u></p> <p>The Audit Scope includes the manufacture of light alloy wheels at six BORBET manufacturing Facilities including Corporate Headquarters at Hallenberg-Hesborn, Germany. The ASI multi-site sampling approach was undertaken to include on-site Audits at Hallenberg-Hesborn and Medebach (Germany).</p> <p>The supply chain activities included in the Audit Scope:</p>

- Material Conversion (Industrial Users)

Criteria from Principle 4 Material Stewardship in the ASI Performance Standard that were identified as non-conformities from the previous Audit were included in the Audit Scope. The Audit was undertaken remotely consistent with the Entity's overall maturity level and the Audit type.

Re-Certification Audit and Scope Change (28 – 31 October 2024)

The Audit Scope includes the manufacture of light alloy wheels at six BORBET manufacturing facilities including Corporate Headquarters at Hallenberg-Hesborn, Germany. The ASI multi-site sampling approach was undertaken to include on-site Audits at Ranshofen (Austria), Bad Langensalza (Germany), and Hallenberg-Hesborn (Germany).

The supply chain activities included in the Audit Scope:

- Material Conversion – Principles 1 to 4 (transition)

All relevant Criteria from Principles 1-4 in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Provisional Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☒ 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.
- ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

17 December 2024 - 16 December 2025

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

16 June 2025

CERTIFICATE NUMBER

169



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

BORBET (the ‘Entity’) manufactures light alloy wheels for the global Original Equipment Manufacturer (OEM) sector. BORBET is one of the leading manufacturers in the industry, with seven locations worldwide including six facilities that are ASI Performance Standard certified, producing over 15.5 million wheels annually. Founded in 1881 as a brass foundry, the company expanded its production to include Aluminium sand casting in 1928. The current headquarters in Hallenberg-Hesborn, Germany was established in 1962, where cast parts were initially manufactured. BORBET has been producing light alloy wheels since 1977 – including the legendary A-wheel from 1987.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	High	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a compliance management system to ensure awareness of and Compliance with Applicable Law and other binding obligations. The Entity is certified against the following Management System standards: ISO 14001 (Environment), TISAX (IT security), ISO 45001 (Occupational Health & Safety) and ISO 50001 (Energy).
1.2 Anti-Corruption	Conformance	Compliance risks have been identified and are systematically managed. A compliance organisation and compliance management system have been implemented to address Corruption and Bribery in all its forms. The Entity has issued and communicated both its Code of Conduct for Employees and Code of Conduct for Suppliers. Both documents are made publicly available: https://www.borbet.de/en/unternehmen/code-of-conduct-and-compliance
1.3a-e Code of Conduct	Conformance	The Entity has issued and publicly communicated its Codes of Conduct for both employees and suppliers, available in both German and English: German: www.borbet.de/en/unternehmen/code-of-conduct-and-compliance English: https://www.borbet.de/en/unternehmen/code-of-conduct-and-compliance It is also communicated internally, and annual training is provided to existing employees and to every new employee. All employees are required to sign the Code.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued, communicated and implemented Policy statements covering environmental, social, and governance aspects. These Policies have been endorsed by senior management which also provide the required resources. The Policies are regularly reviewed. The Code of Conduct and the Declaration of Principles on Respect for Human Rights are available at: https://www.borbet.de/en/unternehmen/code-of-conduct-and-compliance The Borbet Management Policy is available at: https://www.borbet.de/en/company/management-politics
2.2a-c Leadership	Conformance	The Entity's senior management have initiated the implementation of the ASI Performance Standard at all sites and has provided the necessary resources to establish, implement, maintain and improve the Management Systems. They have approved all Policy statements covering environmental, social and governance aspects, and the Policies are reviewed regularly. Senior management has appointed Management Representatives to lead the implementation and communication of these Policies.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and maintains an Environmental and Energy Management System certified to ISO 14001 and ISO 50001, respectively by an accredited certification body. The latest available audit report issued by the certification body in 2023 did not identify any non-conformities.
2.3b Environmental and Social Management Systems – Social	Major Non-Conformance	<p>The Entity has implemented and maintains an Occupational Health and Safety (OH&S) Management System certified to ISO 45001 by an accredited certification body. The latest available audit report issued by the certification body in 2023 did not identify any non-conformities.</p> <p>However, the Social Management System is not adequately implemented, as deficiencies related to OH&S were observed and identified during the Audit. Also, the Entity did not demonstrate that other aspects of the Social Management System are adequately documented (e.g. Human Rights Due Diligence, gender equity and women's empowerment, non-Discrimination, Violence and Harassment, and informing Workers of their rights).</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has issued and made publicly available its Code of Conduct for Suppliers, available at: https://www.borbet.de/medien/files/9812639621.pdf</p> <p>Suppliers are requested to respond to the Entity's supplier questionnaire which includes sustainability topics. Supply chain risks have been evaluated, and supplier monitoring has been established.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	At the time of the Audit, a new production hall was under construction at the Entity's Ranshofen site. The construction was subject to a permitting process that covered environmental and social aspects. The Entity conducted a risk and Impact Assessment and concluded that there are no salient environmental or social impacts associated with the project which would require the disclosure of the assessment or management plan.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	At the time of the Audit, a new production hall was under construction at the Entity's Ranshofen site. The Entity conducted a risk assessment, which included social impacts. However, the risk assessment did not adequately consider potential Human Rights impacts, including a gender analysis. Also, the Human Rights Impact Assessment was not publicly disclosed.
2.7a-f Emergency Response Plan	Conformance	As confirmed by document review and interviews, the Entity has site-specific Emergency Response Plans developed and implemented in collaboration with relevant Stakeholders (e.g. fire brigades). The Entity also holds an ISO 14001 certification which is current to the Entity's Certification Scope under the ASI Performance Standard. Relevant Stakeholders (such as authorities) have access to the emergency plans on demand.
2.8a-d Suspended Operations	Conformance	The Entity has identified and evaluated risks and impacts associated with its operations. Contingency measures associated with suspended operations have been defined for identified risks, as confirmed during the site visits.
2.9a-b Mergers and Acquisitions	Not Applicable	This Criterion is currently not applicable to the Entity as it is not in a merger or and acquisition or post-merger situation.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	<p>The Entity has not fully implemented a process to review environmental, social and governance practices as required by the ASI Performance Standard in the planning process for closure, decommissioning and divestment (CCD), as, at the time of the Audit, its procedure on CCD was available as a draft only.</p> <p>Note: At the time the Entity was not experiencing or in the planning process for closure, decommissioning and divestment</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has issued and made publicly available its Sustainability Reports which address its governance approach and its Material environmental, social and economic impacts. The Borbet Sustainability Report 2023 is available on the Entity's website at: https://www.borbet.de/en/sustainability/product</p> <p>https://www.borbet.de/medien/files/5939d7415e.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has confirmed that "No fines or non-monetary sanctions were imposed on any BORBET location for non-compliance with environmental laws or regulations in the reporting year. There were also no violations in the area of legal compliance or incidents of corruption.", as reported in the Sustainability Report 2023, page 17: https://www.borbet.de/medien/files/5939d7415e.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity confirmed within the publicly disclosed Sustainability Report 2023 (page 47) that it did not donate money directly or indirectly to a political party during the reporting period.</p> <p>https://www.borbet.de/medien/files/5939d7415e.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established and implemented a Complaints Resolution Mechanism and has made the Mechanism available on its website both in German and English. Additionally, they have provided adequate information about its Grievance Mechanism: https://www.borbet.de/unternehmen/code-of-conduct-and-compliance</p> <p>The design of the Mechanism is based on Guiding Principle 31 of the United Nations 'Guiding Principles on Business and Human Rights'.</p> <p>For the South African site, an additional channel is provided by an external service provider who is available to handle complaints in the various languages within the country (KPMG hotline: Telephone +27 800 777 117).</p> <p>The Entity can be contacted via email, website, telephone or via the Ombudsperson, and there is a dedicated email address to contact the Entity's compliance office (compliance@borbet.de).</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has assessed the life cycle impacts of its Products based on the ISO 14040 and ISO 14044 standards, which was verified by an external consultant. The Life Cycle Assessments (LCAs) cover 12 impact categories.</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has demonstrated that it responds to customer requests regarding 'cradle-to-gate' LCAs. System boundaries are stated in the LCA, as well as the definition of the functional unit and the software used.
4.2 Product Design	Conformance	The Entity has established clear objectives in the design and development process for its Products to enhance sustainability, including the environmental life cycle impacts of the end Product. The main aspects include the reduction of weight and more effective improvements to the aerodynamics of the wheels. The Entity uses advanced production technologies that reduce material consumption and optimise aerodynamics, such as flow forming, performance rim and undercut, which enable a weight reduction of up to 1.5 kilograms per wheel compared to conventional technologies. However, the main design decision rests with the customer and the Entity has only limited influence on the design of its Products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented systems and programs to recycle nearly 100% of its Aluminium Process Scrap, either within its site or the Borbet Group, or at external partners. The Entity does not need to separate different grades of Aluminium, as almost all of its Aluminium has a similar alloy specification which will not degrade during re-melting.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has demonstrated its recycling strategy, which is based on the mandatory recycling of vehicles according to the European Directive 2000/53/EC on End of Life Vehicles (ELV). The strategy covers not only the European market but also South Africa, where the Entity is active. The Entity's recycling strategy, including specific timelines, activities and targets is made publicly available in the Sustainability Report 2023, page 34: https://www.borbet.de/medien/files/5939d7415e.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	In Europe, it is legally mandated that all motor cars are dismantled and recycled as required by the ELV Directive (2000/53/EC). The Entity has demonstrated they engage with collection and recycling systems to increase recycling rates for their Products in areas outside the scope of the ELV Directive. The Entity's Products (Aluminium alloy wheels) are a component of cars and End of Life provisions of these parts are mainly the responsibility of the car manufacturers.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.4 GHG Emissions Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.2a-g Discharges to Water	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.3a-g Assessment and Management of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.5a-c Waste Management and Reporting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4 Alien Species	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.2a-e Gender Equity and Women's Empowerment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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's Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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's Certification Scope.
10.2a-c Child Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.3a-c Forced Labour	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.4a-c Non-Discrimination	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.5 Communication and engagement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.6a-g Violence and Harassment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.7a-c Remuneration	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.8a-c Working Time	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
10.9a-b Informing Workers of Rights	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
11.2 Employee engagement on Health and Safety	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 December 2021	Issued - Initial Certification Audit
1	5 September 2023	Surveillance Audit and Scope Change Scope Change to remove the facility in Solingen, Germany
2	6 May 2025	Re-Certification Audit and Scope Change – Provisional Certification Scope Change to apply ASI PS V3, including corresponding change in title of the supply chain activity. Correction to the Surveillance Audit to include the Scope Change component, including update to the description for Revision 1 in the Document Control table; and update to the Audit Scope description to include the targeted and remote nature of the Audit. Update of the Certification Scope to improve clarity on the included facilities.