

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Becker Aluminium- Service GmbH

CERTIFICATE NUMBER

472

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

12 JUNE 2025

CERTIFICATION LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

11 JUNE 2028

ASI ACCREDITED  
AUDITING FIRM

TÜV RHEINLAND  
CERT GMBH

CERTIFIED SINCE

12 JUNE 2025

AUTHORISED BY

A stylized, handwritten signature in black ink.

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

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

CERTIFICATION SCOPE

Slitting, sawing, cutting-to-length,  
contouring, high speed milling and  
ancillary services of products from  
Aluminium coils in Bönen, Germany.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Becker Aluminium-Service GmbH
ENTITY NAME	Becker Aluminium-Service GmbH
CERTIFICATION SCOPE	Slitting, sawing, cutting-to-length, contouring, high speed milling and ancillary services of products from Aluminium coils in Bönen, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion</li><li>Other Manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>7 – 10 January 2025</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>29 April 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope included the slitting, sawing, cutting-to-length, contouring, high speed milling and ancillary services of products from Aluminium coils in Bönen, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion</li><li>Other Manufacturing or sale of products containing Aluminium</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>

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CERTIFICATION PERIOD	12 June 2025 – 11 June 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	11 December 2026
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CERTIFICATE NUMBER	472
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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.

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## ENTITY OVERVIEW

Becker Aluminium-Service GmbH ('the Entity') was founded in 2016 and is a part of the Becker Group which in turn is part of the Klöckner Group. The Entity is a coil processing specialist based in Bönen, Germany.

The Entity operates modern machinery, including a slitting line, a contour cutting line, two high-speed milling machines, a plate saw and a cut-to-length line. The organisation produces Aluminium slit coils and custom-cut shapes (rectangle, trapezoid, arc and omega) as well as small-format sheet in various sizes, thicknesses, and alloys in accordance with customer specifications.

Additional services undertaken on site include surface lubricants (electrostatic, continuous), mill finishes, online measurements (thickness, width, surface), inkjet strip printing, layer thickness control, foiling, paper interlayers and automated inline packaging.

With an annual output of 45,000 tonnes, the Entity is a key supply chain partner to Original Equipment Manufacturers (OEMs) and Tier One suppliers in the automotive sector and beyond.

The Facility is in the northern industrial zone of Bönen, Unna district, near the A2 motorway junction. Biodiversity values at the site are considered low, mainly due to its location and no priority ecosystem services, or cultural heritage sites are affected by their operations. The distance from the Facility to the nearest Protected Areas of "Kriegsdenkmal am Lindenplatz" and "Förderturm Königsborn" is over five kilometres.

## MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Low	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented and maintains a system to ensure Compliance with Applicable Law. The Facility is certified against following management system standards: ISO 14001 (environment), ISO 45001 (Occupational Health & Safety), ISO 50001 (energy) TISAX (IT Security) and IATF 16949 (quality management). Compliance risks have been identified and are systematically managed. The Becker Group employs an 'in-house' Compliance Officer in addition to the parent Klöckner Group's compliance department with documented processes and procedures at each level.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented a system to work against Corruption. The Klöckner Group Corporate Code of Conduct and various other corporate guidelines addressing anti-Corruption have been issued and communicated within the Entity. The Code of Conduct has been translated into several languages and is available on the Group's website at: <a href="https://www.kloeckner.com/en/group/compliance/">https://www.kloeckner.com/en/group/compliance/</a>
1.3a-e Code of Conduct	Conformance	A Klöckner Group Corporate Code of Conduct and various other corporate guidelines have been issued and communicated within the Entity. The Code of Conduct has been translated into several languages and is available on the Group's website at: <a href="https://www.kloeckner.com/en/group/compliance/">https://www.kloeckner.com/en/group/compliance/</a>  The Code is also communicated internally and to every new Worker. Employees are required to sign the Code. Refresher training for Workers is conducted every two years.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	Both the Klöckner Group and the Entity have issued and communicated their Policy statements on the external website and internal intranet. Training on these Policies is available for Workers.  These Policies have been endorsed by senior management who have also provided the resources required for their implementation. The Policies are regularly reviewed.  To implement these Policies, the Entity has established an Integrated Management System to ensure effective implementation of the ASI Performance Standard. Several aspects of the Integrated Management System have been certified against international management system standards (i.e. ISO 14001, ISO 45001, ISO 50001, TISAX and IATF16949).  Klöckner Group Policy documents are publicly disclosed at: <a href="https://www.kloeckner.com/en/group/compliance/">https://www.kloeckner.com/en/group/compliance/</a>
2.2a-c Leadership	Conformance	The Managing Director has overall responsibility for the implementation of ASI requirements and leads communication of the Policies at the Entity.  The Managing Director is supported by a local ASI Coordinator and Klöckner Group's central sustainability team. All roles are clearly defined.

CRITERION	RATING	COMMENT
		The document review, site tour and interviews conducted in this Audit confirmed that sufficient implementation resources are provided.
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented and is maintaining an Environmental and Energy Management System which is certified against ISO 14001 and ISO 50001 by an accredited certification body.</p> <p>The recent audit report from the certification body did not identify any non-conformity relating to the Entity's Environmental and Energy Management System</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has established a documented Social Management System which is based on the Klöckner Group's Code of Conduct and Human Rights Declaration, and are publicly disclosed at: <a href="https://www.kloeckner.com/en/group/compliance/">https://www.kloeckner.com/en/group/compliance/</a></p> <p>The Social Management System is informed by a comprehensive risk assessment which evaluated compliance with the German Supply Chain Due Diligence Act (LkSG).</p> <p>The Health and Safety aspect of the Social Management System is certified according to ISO 45001 by an accredited certification body.</p>
2.4a-e Responsible Sourcing	Conformance	<p>Klöckner Group has issued and communicated its Supplier Code of Conduct and Declaration of Principles on Respect for Human Rights and corresponding environmental standards. These documents describe the Entity's Responsible Sourcing practices and are disclosed at: <a href="https://www.kloeckner.com/en/group/compliance/">https://www.kloeckner.com/en/group/compliance/</a></p> <p>All suppliers undergo an 'onboarding process' including a screening on Environmental, Social and Governance (ESG) risks. Suppliers must commit to Klöckner's Supplier Code of Conduct.</p> <p>As part of the Entity's supply chain management system, relevant suppliers are systematically assessed and evaluated.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is currently not applicable to the Entity as no New Projects or Major Changes to existing Facilities have occurred since the Entity joined ASI. There are no New Projects or Major Changes expected in the near future.</p> <p>The Entity has a procedure in place to ensure that social, cultural and Human Rights impact assessments, including a gender analysis, will be conducted for New Projects or Major Changes to existing Facilities.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is currently not applicable to the Entity as no New Projects or Major Changes to existing Facilities have occurred since the Entity joined ASI. There are no New Projects or Major Changes expected in the near future.</p> <p>The Entity has a procedure in place to ensure that social, cultural and Human Rights impact assessments, including a gender analysis, will be conducted for New Projects or Major Changes to existing Facilities.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented site-specific Emergency Response Plans (ERPs). The ERPs were developed in collaboration with relevant Stakeholders.</p> <p>Emergency Response Plans are available on request to relevant Stakeholders.</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Resilience Plan which is appropriate to the size and nature of its business. The Plan covers situations where the Entity may have to suspend or significantly alter operations due to factors outside its control.
2.9a-b Mergers and Acquisitions	Conformance	The Klöckner Group has issued a procedure for managing the Due Diligence process for mergers and acquisitions which addresses ESG issues. At the time of the Audit, the Entity is not in a merger, acquisition or post-merger situation.
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	<p>The Klöckner Group's business development team is responsible for ensuring that ESG practices are reviewed in the planning process for Closure, Decommissioning and Divestment (CCD). A documented procedure for managing CCD was provided. Management confirmed that there are no current plans to close, decommission or divest the Entity.</p> <p>The CCD procedure however does not explicitly reference ESG issues.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>Klöckner Group's annual Sustainability Report discloses information on the Group's ESG approach, initiatives and performance. The Sustainability Report is publicly disclosed on the Klöckner Group website at:</p> <p><a href="https://www.kloeckner.com/en/sustainability/sustainability/">https://www.kloeckner.com/en/sustainability/sustainability/</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed information on violations and sanctions for failure to comply with Applicable Law at:</p> <p><a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/3.2_3.3%20Noncompliance%20and%20liabilities_Payment%20to%20governments_V2_neu.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/3.2_3.3%20Noncompliance%20and%20liabilities_Payment%20to%20governments_V2_neu.pdf</a></p> <p>In this statement, the Entity's management confirmed that there were no such violations in 2024.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has publicly disclosed a statement that on payments to governments. In this statement, management confirmed that the Entity did not make any such payments outside a legal basis in 2024:</p> <p><a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/3.2_3.3%20Non-compliance%20and%20liabilities_Payment%20to%20governments_V2_neu.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/3.2_3.3%20Non-compliance%20and%20liabilities_Payment%20to%20governments_V2_neu.pdf</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Klöckner Group has implemented a 'whistleblower' hotline and has made the mechanism available on its website in both German and English at: <a href="https://www.kloeckner.com/en/group/whistleblower-system/">https://www.kloeckner.com/en/group/whistleblower-system/</a></p> <p>Other Stakeholder complaints, grievances and requests for information can be made through the contact information available on the Entity's website at: <a href="https://www.becker-metals.com/kontakt/">https://www.becker-metals.com/kontakt/</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Klöckner Group has a system in place to calculate and issue carbon footprints for its major Products.

CRITERION	RATING	COMMENT
		However, impact categories other than CO <sub>2</sub> emissions have not yet been assessed and therefore the Life Cycle Assessment (LCA) is incomplete. The underlying assumptions and system boundaries were not evident.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	As confirmed by the Entity's management, the Entity has not yet received any customer request for a 'cradle-to-gate' LCA report for its Products.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as the Entity operates as a service centre without any design activities or responsibilities. Customers provide the complete Product specification.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise and monitor the generation of Aluminium Process Scrap. There are measures in place to decrease the generation of Process Scrap. Scrap quantities are regularly reviewed.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity has implemented its Recycling Strategy, which reflects the Waste Mitigation Hierarchy and aims to avoid, reduce and recycle Aluminium Scrap. Efforts have been made to establish closed production loops ('Loop-Back Service'). Aluminium Scrap is collected and segregated to ensure optimal recycling rates.</p> <p>The Entity's published Recycling Strategy however does not contain specific timelines, activities or targets: <a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%206.5%20c%20Abfallhierarchie%20ausgerichtet%20Abfallbewirtschaftungsstrategie.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%206.5%20c%20Abfallhierarchie%20ausgerichtet%20Abfallbewirtschaftungsstrategie.pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is an Aluminium coil service provider, operating solely in a 'business-to-business' relationship. As the Entity's customers distribute Products on the market, the primary responsibility for recycling of the Products is with the customer. The Entity is however working with its customers to foster the circularity of the Products by developing closed loop systems.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Klöckner Group has disclosed their Scope 1, 2 and 3 Greenhouse Gas (GHG) emissions data, which have been verified by an independent body. The data are disclosed together with an assurance statement at a Group level in the Sustainability Report 2023, page 34: <a href="https://www.kloeckner.com/dam/kco/files/de/publications/2024/Nachhaltigkeitsberichterstattung%202023.pdf">https://www.kloeckner.com/dam/kco/files/de/publications/2024/Nachhaltigkeitsberichterstattung%202023.pdf</a></p> <p>Specific data on the Entity's energy use however were not made publicly available, with only data at the Group level available.</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 -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has disclosed their GHG Emissions and Emissions Reduction Plan which includes a GHG Emissions Reduction Pathway with procurement and process slopes at: <a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%205.1%20GHG%20Emissions%20and%20Emissions%20Reduction%20Plan.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%205.1%20GHG%20Emissions%20and%20Emissions%20Reduction%20Plan.pdf</a></p> <p>The Entity's GHG Emissions Reduction Plan is consistent with the ASI endorsed methodology. Intermediate targets are provided and the baseline year selected is 2019. The Plan is reviewed annually.</p>
5.4 GHG Emissions Management	Conformance	The Entity works systematically to manage and reduce GHG emissions. It is certified against ISO 50001 (energy management system). The certification body's latest audit report did not identify any non-conformity related to the energy management system.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Not Applicable	This Criterion is currently not applicable to the Entity, as the associated Emissions to Air (other than CO <sub>2</sub> ) are considered not Material by the Entity.
6.2a-g Discharges to Water	Not Applicable	This Criterion is currently not applicable to the Entity as there are no Material Discharges to Water. Water is almost exclusively used for sanitary purposes only. Water is not used for production purposes. All water is discharged into the public sewage system.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented an Environmental Management System (EMS) certified to ISO 14001 which incorporates procedural and operational controls to prevent and detect Spills and Leakages. External communications are specified in the Entity's alarm and action plan. There is no requirement for the management plan publicly available as the Entity has rated the risk of Material spills or leakages as low.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity as at the time of the Audit there have not been Material Spills or Leakages reported.</p> <p>External communications are specified in the Entity's alarm and action plan.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented an EMS certified to ISO 14001. The Entity demonstrated that Waste is duly separated, collected and disposed of or recycled respectively. A documented Waste Management Strategy is in place.</p> <p>The Entity has disclosed the quantities of Hazardous and Non-Hazardous Waste generated at: <a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%206.5%20a%20Gef%C3%A4hrliche_nicht%20gef%C3%A4hrliche%20Abf%C3%A4lle%202024.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%206.5%20a%20Gef%C3%A4hrliche_nicht%20gef%C3%A4hrliche%20Abf%C3%A4lle%202024.pdf</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has implemented an EMS certified to ISO 14001:2015. Information on the Entity's water consumption is collected at a Becker Group level and is not Entity specific. Water consumption is not Material as water is almost exclusively used for sanitary purposes only. The information is disclosed at: <a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%207.1%20a-b_Water%20Assessment%20Report.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%207.1%20a-b_Water%20Assessment%20Report.pdf</a>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the Entity's risk assessment did not identify Material risks to water or watersheds.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>An external expert has conducted an assessment of the risks to, and potential impacts on Biodiversity and Ecosystem services from the land use and activities within the Entity's Area of Influence. The study and a related action plan are made publicly available on the Entity's website at: <a href="https://www.becker-metals.com/aluminium/Nachhaltigkeit/">https://www.becker-metals.com/aluminium/Nachhaltigkeit/</a></p> <p>In the study it is stated that 'there are no international, national or regional Protected Areas or protected habitats on or in the immediate vicinity of the operating site. There are protected biotopes (orchards) in the vicinity of the site, but the production site has no direct or detrimental impact on them.' The Entity has decided to extend the study with further detailed onsite observations.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the recent Biodiversity and Ecosystem Services study concluded that there are no Priority Ecosystem Services or Material impacts to Biodiversity.
8.2a-g Biodiversity Management	Conformance	A Biodiversity Action Plan has been developed and been made publicly available at: <a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%208.2%20a-g%20Biodiversity%20Action%20Plan.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%208.2%20a-g%20Biodiversity%20Action%20Plan.pdf</a>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the recent Biodiversity and Ecosystem Services study concluded that there are no Priority Ecosystem Services or Material impacts to Biodiversity.
8.4 Alien Species	Conformance	The Entity's risk assessment concluded that the risk related to Alien Species are currently not Material, as materials are sourced from within Europe. If sourcing is undertaken from non-European suppliers, the Entity is committed to implement strict preventive controls to avoid invasive species. The Entity's Product is inorganic and the wooden packaging used is treated for overseas export.

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity’s management confirmed that the Entity does not operate in or plan to explore or develop New Projects in or close to World Heritage Properties. The nearest culturally significant site is located approximately five kilometres from the Entity’s site (‘winding tower Königsborn’) but due to the small size and the nature of the Entity’s activities, the Entity has no Material impact on this heritage site.
8.6a-d Protected Areas	Conformance	As confirmed via interviews and document review, the Entity has assessed and determined the absence of any Protected Areas within its Area of Influence.  The Entity’s management confirmed that the Entity does not operate in or plan to explore or develop New Projects in or close to Protected Areas.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	As the Entity’s parent company, the Klöckner Group has issued a Human Rights Policy at: <a href="http://www.kloeckner.com/dam/kco/group/compliance/human-rights/Human_Rights_Declaration_EN_V2.0.pdf">www.kloeckner.com/dam/kco/group/compliance/human-rights/Human_Rights_Declaration_EN_V2.0.pdf</a>  The Entity has conducted a gender-sensitive Human Rights Due Diligence assessment. The assessment concluded that the Entity did not cause or contribute to salient Human Rights issues.
9.2a-e Gender Equity and Women’s Empowerment	Conformance	Klöckner Group has developed and implemented Policies and initiatives that conform to the gender equity and women’s empowerment requirements. The Group reports publicly on their performance on gender issues in their Sustainability Report at: <a href="https://www.kloeckner.com/en/investors/publications/">https://www.kloeckner.com/en/investors/publications/</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity (which is located in Central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	As confirmed by document review during this Audit, there are no sacred or cultural heritage sites on the property, or in the vicinity of the production site which would be directly impacted by the Entity. The nearest World Heritage area is located approximately five kilometres away ('winding tower Königsborn').
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as no resettlements or displacements have occurred, are taking place, are being considered or are expected to occur during the Certification period.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity's site is located within an industrial zone in Germany, Central Europe.</p> <p>Affected Populations and Organisations have been identified within the framework of the Entity's Management System for environment, health and safety (Industrial neighbours and authorities, amongst others). The Entity concluded that it has no Material direct impact on these Populations and Organisations.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity is not located in or near a Conflict-Affected and High-Risk Area (CAHRA). The Entity and its parent Klöckner Group have implemented a comprehensive Management System to avoid involvement in armed conflict or Human Rights abuses. The Entity is supported by an expert external service provider. The Entity follows the definition of CAHRAs provided by the European Union (see <a href="https://www.cahraslist.net/">https://www.cahraslist.net/</a> ).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has implemented standards for its supply chain, which clearly define rules and the expectations for suppliers, contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating, which covers armed conflicts and Human Rights abuses.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	As part of its supply chain Management System, the Entity has documented and implemented a strategy to respond to identified risks in their supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>Klöckner has implemented a supply chain Due Diligence process, which applies to the Entity. Klöckner publicly reports on its supply chain Due Diligence, see the 'Arbeitskräfte in der Wertschöpfungskette' section of the Sustainability Report at:</p> <p><a href="https://www.kloeckner.com/dam/kco/files/de/publications/2025/Kloeckner_Co_Nachhaltigkeitsbericht2024.pdf">https://www.kloeckner.com/dam/kco/files/de/publications/2025/Kloeckner_Co_Nachhaltigkeitsbericht2024.pdf</a></p>
9.9 Security practice	Not Applicable	This Criterion is currently not applicable to the Entity as it does not utilise private 'in-house' or external public security providers.

CRITERION	RATING	COMMENT
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Group is committed to respecting the Freedom of Association and the right to Collective Bargaining of all employees within the framework of Applicable National Laws and regulations, as stated in the Klöckner Code of Conduct at:</p> <p><a href="https://www.kloeckner.com/dam/kco/files/en/compliance/Kloeckner_CoC_EN.pdf">https://www.kloeckner.com/dam/kco/files/en/compliance/Kloeckner_CoC_EN.pdf</a></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 Freedom of Association and the right to Collective Bargaining are not restricted by law.
10.2a-c Child Labour	Conformance	<p>The Entity neither uses nor support the use of Child Labour. The minimum working age of 15 years set under Applicable Law is respected. At the time of the Audit, the youngest Worker was 18 years old. The Entity has robust practices to ensure that children are not employed.</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour or human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.</p> <p>However, the Entity has not demonstrated that the risk associated with the use of agency Workers is adequately managed, as Labour agencies have not yet been sufficiently assessed.</p> <p>The Entity's Modern Slavery Statement is disclosed at:</p> <p><a href="https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%2010.3%20a-c_Modern%20Slavery%20and%20Human%20Trafficking_Statement.pdf">https://www.becker-metals.com/dam/bss/asi-zertifizierung_2025/ASI%2010.3%20a-c_Modern%20Slavery%20and%20Human%20Trafficking_Statement.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>Klöckner Group commits to complying with relevant international standards, including the Universal Declaration of Human Rights of the United Nations, the UN Guiding Principles on Business and Human Rights, the International Labor Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.</p> <p>The Entity's position on non-Discrimination is disclosed in its Human Rights Policy at:</p> <p><a href="https://www.kloeckner.com/dam/kco/group/compliance/human-rights/Human_Rights_Declaration_EN_V2.0.pdf">www.kloeckner.com/dam/kco/group/compliance/human-rights/Human_Rights_Declaration_EN_V2.0.pdf</a></p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented several channels to systematically and openly communicate with its employees. Interviewed Workers confirmed that there is no inherent threat of reprisal, intimidation or Harassment.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Klöckner Group's Code of Conduct states that "We watch out for ... verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment. Such will never be tolerated".</p>

CRITERION	RATING	COMMENT
		<p>Interviews with Workers and management confirmed that the workplace is currently free from Violence and Harassment.</p> <p>However, at the Entity level, an adequate workplace Policy on Violence and Harassment has not yet been issued, communicated and implemented.</p>
10.7a-c Remuneration	Conformance	<p>Workers receive work contracts prior to the start of their employment. The contract details all necessary information including working hours, payment and vacation allowances. Document review and interviews with Workers, Worker representatives and management confirmed that wages exceed the national legal minimum. At the time of the Audit, they were negotiated individually however a collective agreement negotiated with the Worker representation is planned to come into effect in the foreseeable future. Overtime is paid with a premium of at least 25%.</p> <p>Salary and wages are paid monthly into the employees' bank accounts on a regular and timely manner.</p>
10.8a-c Working Time	Conformance	<p>The Entity provided documented evidence that it complies with Applicable Law and industry standards on Working Time, Overtime, public holidays and vacation.</p> <p>Workers have a 38.75 to 40 hour working week, which is in accordance with legal requirements. Workers do not usually work more than eight hours per workday as an average over a six-month period. Workers have two days off per seven-day period.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>As confirmed by interviews with Workers and management during the Audit, the Entity's Workers are informed on Human and Labour Rights during the onboarding process. All Workers receive training on fundamental documents such as the Code of Conduct and Klockner's Human Rights Declaration.</p> <p>Relevant labour laws are posted, as mandated by law. The Worker representatives also inform Workers on their rights.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has implemented its Occupational Health &amp; Safety (OH&amp;S) Management System which is certified against ISO 45001 by an accredited certification body.</p> <p>However, this management system is not fully effective, as a few isolated weaknesses concerning the use of personal protective equipment, implementation of life saving rules and the provision of break rooms were observed during the Audit.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity's OH&amp;S Management System is ISO 45001 certified by an accredited certification body. The Entity has implemented its OH&amp;S Policy. The OH&amp;S Management System including the Policy is reviewed annually. OH&amp;S performance is disclosed in the Group Sustainability Report at: <a href="https://www.kloeckner.com/en/sustainability/sustainability/">https://www.kloeckner.com/en/sustainability/sustainability/</a></p> <p>However, Entity-specific leading and lagging OH&amp;S performance indicators and a comparison with peers and leading practice are not publicly available.</p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	The Entity has mechanisms in place to discuss OH&S issues with both management and Workers. A joint Health and Safety committee is in place and meets quarterly, in line with legal requirements. Additionally, top management maintains a regular dialogue with the works council. The Entity has a process for idea management in place.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 June 2025	Initial Certification Audit – Full Certification