# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

## OTTO FUCHS KG

CERTIFICATE NUMBER

307

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

5 SEPTEMBER 2023

CERTIFICATION LEVEL

FULL CERTIFICATION

**DATE OF EXPIRY** 

4 SEPTEMBER 2026

ASI ACCREDITED AUDITING FIRM

GUTCERT (AFNOR GROUP)

**CERTIFIED SINCE** 

5 SEPTEMBER 2023

#### **AUTHORISED BY**

The

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**

Design and manufacturing of materials and products covering the following production processes: casting, extruding, die and hand forging as well as joining processes at the OTTO FUCHS KG facility, located in Meinerzhagen, Germany.

The Certification Scope currently excludes the casthouse/foundry.

# AUDIT REPORT PERFORMANCE STANDARD

### **OVERVIEW**

MEMBER NAME	OTTO FUCHS KG & Schüco International KG			
ENTITY NAME	OTTO FUCHS KG			
CERTIFICATION SCOPE	Design and manufacturing of materials and products covering the following production processes: casting, extruding, die and hand forging as well as joining processes at the OTTO FUCHS KG facility, located in Meinerzhagen, Germany.			
	The Certification Scope currently excludes the casthouse/foundry.			
SUPPLY CHAIN ACTIVITIES	Material Conversion – Principles 1 to 4 (transition)			
ASI STANDARD	Performance Standard V3.1			
AUDIT TYPE	<ul> <li>Initial Certification Audit (26 – 30 September 2022)</li> <li>Surveillance Audit (5 March 2025)</li> </ul>			
AUDIT FIRM	GUTcert (AFNOR Group)			
AUDIT DATE	<ul> <li>26 – 30 September 2022 (Initial Certification Audit)</li> <li>5 March 2025 (Surveillance Audit)</li> </ul>			
AUDIT REPORT SUBMISSION	<ul><li>12 July 2023 (Initial Certification Audit)</li><li>28 March 2025 (5 March 2025)</li></ul>			
AUDIT SCOPE	Initial Certification Audit (26 – 30 September 2022)  The Audit Scope covered all design, manufacturing (casting, extruding, die and hand forging as well as joining processes) activities, except the Casthouse/Foundry.			
	Supply chain activities included in the audit scope:  Material Conversion – Principles 1 to 4 (transition)			
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope.			
	Surveillance Audit (5 March 2025)  The Audit Scope covered all design, manufacturing (casting, extruding, die and hand forging as well as joining processes) activities, except the Casthouse/Foundry.			
	Supply chain activities included in the audit scope:  Material Conversion – Principles 1 to 4 (transition)			
	Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.			
AUDIT OUTCOME	Certification			

AUDIT	<b>METHODOLOGY</b>
<b>DECLA</b>	RATION

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** 

5 September 2023 – 4 September 2026

**NEXT AUDIT TYPE** 

Re-Certification Audit

**NEXT AUDIT DATE** 

4 September 2026

**CERTIFICATE NUMBER** 

307



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

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**

OTTO FUCHS KG (the 'Entity') was founded in 1910 in Meinerzhagen, Germany and is a leading, internationally active company in the non-ferrous metals industry. It currently employs approximately 2,700 employees. It has customers in the aerospace, automotive and construction industries, as well as in industrial engineering. Based on in-house material, the Entity manufactures high-quality semi-finished and finished products, in particular metallurgically demanding forgings, extruded products and rolled rings made from aluminium, magnesium, copper, titanium and nickel alloys, which are used where safety, lightweight design, reliability and durability are important.

The OTTO FUCHS Group has subsidiaries in Germany, Hungary, South Africa, the United States and China. It employs over 9,600 people globally.

#### **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	High	Medium	MEDIUM
RISKS	Medium	High	High	HIGH
PERFORMANCE	Medium	High	Low	MEDIUM
OVERALL		MED	IUM	

### **FINDINGS**

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard legal compliance requirements. The Managing Director takes overall responsibility for legal compliance. There are systems in place (e.g., a legal database and qualified legal advisers) to maintain awareness of and to ensure compliance with Applicable Law. The Entity holds ISO 14001, ISO/IEC 27001, ISO 45001, ISO 50001 and other certificates from accredited certification bodies to ensure Compliance with Applicable Law, see: <a href="https://www.otto-fuchs.com/de/infocenter/zertifizierungen.html">https://www.otto-fuchs.com/de/infocenter/zertifizierungen.html</a>
1.2 Anti-Corruption	Conformance	The Entity has established a compliance assessment process, with eight compliance related guidelines implemented.  A Code of Conduct has been developed which addresses Anti-Corruption and is communicated internally is the overarching component.  The Code is available on the Entity's website: <a href="https://www.otto-fuchs.com/de/compliance#compliance_doc">https://www.otto-fuchs.com/de/compliance#compliance_doc</a> Relevant employees have received training accordingly.
1.3a-e Code of Conduct	Conformance	The Entity has issued and communicated its Code of Conduct in both English and German:  https://www.otto-fuchs.com/downloads/03-compliance-integritaet/verhaltenskodex.pdf  https://www.otto-fuchs.com/downloads/03-compliance-integritaet/code-of-conduct.pdf  A periodic review has been planned.
2. POLICY AND MANAGEMEN	ІТ	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Environmental, Social and Governance Policy is set out in several publicly available documents, which are endorsed by senior management. These include:  HSE Policy: https://www.otto-fuchs.com/downloads/01-allgemein/m-h-a-0003-ev-0-hse-politik.pdf  Code of Conduct: https://www.otto-fuchs.com/downloads/03-compliance-integritaet/verhaltenskodex.pdf  Supplier Code of Conduct: https://www.otto-fuchs.com/downloads/03-compliance-integritaet/lieferanten/lieferantenverhaltenskodex.pdf  Guideline for Human Rights: https://www.otto-fuchs.com/downloads/03-compliance-integritaet/menschenrechtsrichtlinie.pdf  Declaration of Principles on Respect for Human Rights and Environmental Standards: https://www.otto-fuchs.com/downloads/03-compliance-integritaet/grundsatzerklaerung-mensch-umwelt.pdf  The Policies are endorsed by senior management, and human and fiscal resources are provided to implement these policies, which are

CRITERION	RATING	COMMENT
		subject to regular review. The Entity has also established comprehensive communication of its social policy aspects to its Workers.
2.2a-c Leadership	Conformance	As confirmed by interviews and document review, the ultimate responsibility for the implementation of the company Policies lies with the personally liable partner. A senior manager is in charge of leading the communication of the Policies. This manager is supported by an appointed ASI Manager and the entire management team.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an integrated management system, with a certified environmental aspect according to ISO 14001:2015 and ISO 50001:2018. There are no overdue open actions from the latest audit report of the certification body. Copies of the certificates can be found at: <a href="https://www.otto-fuchs.com/de/infocenter/zertifizierungen.html">https://www.otto-fuchs.com/de/infocenter/zertifizierungen.html</a>
2.3b Environmental and Social Management Systems - Social	Minor Non- Conformance	The Entity has defined a documented Social Management System. The Occupational Health and Safety (OH&S) component of the Social Management System is certified against ISO 45001 by an accredited certification body. The Entity is subject to a Collective Bargaining Agreement negotiated with the Union. In addition, there are several agreements concluded with the freely elected Works Council. In these agreements and the CBA, many important elements of a Social Management System are already incorporated. However, the system is not yet fully effective as the Entity's objectives and action plan related to social performance was still in draft at the time of the Audit and had not yet endorsed by senior management.
2.4a-e Responsible Sourcing	Conformance	The Entity has documented and made publicly available the Responsible Sourcing Policy in their Guidelines for Responsible Procurement and the Supplier Code of Conduct. Both documents can be accessed at: <a href="https://www.otto-fuchs.com/de/compliance#compliance_doc">https://www.otto-fuchs.com/de/compliance#compliance_doc</a>
		The Entity has implemented a system for the identification and management of risks related to its suppliers. Supported by an external service provider, the Entity receives and evaluates information about its suppliers daily.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not have New Projects or Major Changes that would have required an Environmental or Social Impact Assessment since it joined ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is currently not applicable to the Entity, as it does not have New Projects or Major Changes that would have required an Environmental or Social Impact Assessment since it joined ASI.I
2.7a-f Emergency Response Plan	Conformance	The audited plant is a 'Seveso-III' site and accordingly an incident concept was developed, and emergency precautions were taken. Information for the public is available at: <a href="https://www.otto-fuchs.com/de/verantwortung/hse.html">https://www.otto-fuchs.com/de/verantwortung/hse.html</a> The Entity has established site-specific emergency response plans developed in collaboration with relevant Stakeholders. A public fire brigade is located nearby. The Entity is certified against ISO 14001 and ISO 45001.

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has addressed situations due to factors outside its control, which could lead to suspended operations. Whilst there is no single Business Resilience Plan, the Entity has developed and prepared several plans for different situations (such as a pandemic or loss of energy/power).
2.9a-b Mergers and Acquisitions	Conformance	At the time of the Audit, the Entity was not in a post-merger or - acquisition phase. However, the Entity's management made determinations in their management manual for such situations and it would be managed by a project team which must comply with the requirements of this Criterion.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity does not have plans to close, decommission or divest the site. However, the Entity's management made determinations in their management manual for such situations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and material environmental, social, and economic (ESG) impacts in its Sustainability Report 2018-2020 and its 'global integrated management manual', both documents are accessible via: <a href="https://nachhaltigkeit.otto-fuchs.com/de/">https://nachhaltigkeit.otto-fuchs.com/de/</a> The published data are aggregated at the group level.
3.2 Non-compliance and Liabilities	Conformance	The OTTO Fuchs Group has disclosed information about non-compliances and liabilities within its Sustainability Report 2018-2020, section 3 'Compliance', accessible via <a href="https://nachhaltigkeit.otto-fuchs.com/de/2018-2019-2020/03-compliance.html">https://nachhaltigkeit.otto-fuchs.com/de/2018-2019-2020/03-compliance.html</a> There, the following is stated: "In the reporting period, the German Federal Cartel Office (Bundeskartellamt, BKartA) issued a fine notice against OTTO FUCHS for prohibited anti-competitive agreements. In addition to OTTO FUCHS, five other aluminium forges were involved in the proceedings. OTTO FUCHS has appealed the decision of the BKartA in full". Beyond this, there were no further cases of significant fines and/or non-monetary sanctions due to non-compliance with laws and/or regulations in the social, environmental and economic areas in the reporting period.
3.3a-c Payments to Governments	Conformance	The OTTO FUCHS group has a system and processes in place to ensure that the Entity only makes, or has made on its behalf, payments to governments, including political parties, on a legal and/or contractual basis.  In the Sustainability Report, there is a list of clubs and associations, that OTTO FUCHS Group supports, section 2: https://nachhaltigkeit.otto-fuchs.com/fileadmin/user_upload/Bericht_2018_2019_2020/Strategie_und_Nachhaltigkeitsansatz/NHB2018-2019-2020-Vereine-Verbaende-OTTOFUCHS.pdf  The Entity has made publicly available information regarding payments to political parties in their updated Sustainability Report, section 9. It is confirmed that no donations were made to political parties.

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	A Grievance Mechanism has been implemented by the Entity. All grievances can be directed to an independent lawyer as required. Relevant information is available on the Entity's website at: https://www.otto-fuchs.com/de/compliance#compliance
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has provided evidence of Life Cycle Assessments of its major products (some are still in progress). Currently, these assessments only address the carbon footprint of the metals.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has a process in place to ensure that cradle-to-gate life cycle information will be made available on customer request, Presently, the Entity does not intend to publicly communicate its Life Cycle Assessments.
4.2 Product Design	Conformance	One of the strategic objectives of the Entity's product development function is to reduce the weight of the products and to reduce process scrap. However, except for some products (such as wheels, suspension arms and battery housings), it is standard practice that the design specifications are provided by the clients, without the Entity having a possibility of design adaptation (apart from necessary adaptations in terms of manufacturability).
4.3a-b Aluminium Process Scrap	Conformance	The Entity thoroughly separates alloys for recycling as confirmed by a site tour, interviews and documents. It is in the Entity's commercial interest to ensure its alloy separation and recovery. Therefore, procedures and controls are in place and as such the Aluminium recycling rate approach is 100%.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non- Conformance	The OTTO FUCHS Group has established and publicly disclosed its recycling strategy (see Otto Fuchs online Sustainability Report, Section 8: https://nachhaltigkeit.otto-fuchs.com/de/2018-2019-2020/08-partnerschaftliche-lieferkette.html )  However, specific timelines, activities and targets related to the recycling strategy are not included in this Report.
4.4d Collection and Recycling of Products at End of Life	Conformance	As the Entity is supplying other businesses, not consumers, it works with clients and supports trade associations to foster the recycling of Aluminium. This has been demonstrated via document review and interviews.
5. GREENHOUSE GAS EMISSION	ONS	
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 -	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	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 AN	D 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 ECOSY	STEM 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.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
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.
11. OCCUPATIONAL HEALTH A	ND 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.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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

#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	5 September 2023	Initial Certification Audit – Full Certification
1	25 July 2025	Surveillance Audit