

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Aluminium Duffel BV

CERTIFICATE NUMBER  
**31**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

DATE OF ISSUE  
**31 JULY 2025**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

DATE OF EXPIRY  
**30 JULY 2028**

ASI ACCREDITED  
AUDITING FIRM  
**BUREAU VERITAS  
CERTIFICATION**  
  
CERTIFIED SINCE  
**31 JULY 2018**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. de Vries', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
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[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

Sales, development, production  
and dispatch of rolled products in  
Aluminium and Aluminium alloys  
(Belgium).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Aluminium Duffel BV
ENTITY NAME	Aluminium Duffel BV
CERTIFICATION SCOPE	Sales, development, production and dispatch of rolled products in Aluminium and Aluminium alloys (Belgium).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining,</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (24 – 25 April 2019)</li><li>Surveillance Audit (24 January 2022) (Following acquisition of the Entity (formerly Aleris Aluminum Duffel BVBA) by Alvalde Aluminium Duffel BV on 30 September 2020)</li><li>Re-Certification Audit (18 – 19 May 2022)</li><li>Surveillance Audit (31 January 2023) (Following acquisition of the Entity formerly Alvalde Aluminium Duffel BV by Aluminium Duffel BV on 14 June 2022)</li><li>Re-Certification Audit and Scope Change (19 – 22 May 2025)</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>24 – 25 April 2019 (Initial Certification Audit)</li><li>24 January 2022 (Surveillance Audit)</li><li>18 – 19 May 2022 (Re-Certification Audit)</li><li>31 January 2023 (Surveillance Audit)</li><li>19 – 22 May 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>17 May 2019 (Initial Certification Audit)</li><li>4 March 2022 (Surveillance Audit)</li><li>5 July 2022 (Re-Certification Audit)</li><li>28 March 2023 (Surveillance Audit)</li><li>16 June 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 April 2019)</u></p> <p>Aleris Aluminum Duffel BVBA is a mill in Belgium that provides automotive body sheet and General coil and sheet products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>

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All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (24 January 2022)

Alvance Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

The Surveillance Audit was undertaken as a 'desktop' exercise due to the close proximity to the scheduled Re-Certification Audit (July 2022) and ongoing COVID-19 travel limitations present at the time of the Audit.

Re-Certification Audit (18 – 19 May 2022)

The Alvance Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (31 January 2023)

Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification and Scope Change Audit (19 – 22 May 2025)

Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME

- Certification

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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.
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- ☑ 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.
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CERTIFICATION PERIOD	31 July 2025 – 30 July 2028
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	30 July 2028
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CERTIFICATE NUMBER	31
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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

The Aluminium Duffel facility (the 'Entity') is in Duffel, Belgium, and was established in 1946 and has since developed into a leading producer of high-quality rolled Aluminium products. The Entity specialises in the production of Aluminium sheet and coil for applications across the automotive, construction, and industrial sectors.

Operations undertaken at the Entity include re-melting, Casting, hot and cold rolling, heat treatment, and surface treatment of Aluminium. The Entity supplies products to customers worldwide, with a strong emphasis on quality, innovation, and sustainability. The Entity covers an area of approximately 43 hectares (ha) and employs approximately 1,000 permanent personnel, who are collectively supported by several specialised Contractors. The Entity also includes extensive production installations, laboratories for quality control and co-engineering, administrative offices, and supporting services.

The Entity is located approximately two kilometres from the centre of Duffel, a municipality in the province of Antwerp. The immediate surroundings include both residential areas and local commercial zones. The nearest residential neighbourhoods are situated less than one kilometre from the site. Nearby sensitive areas include Nazareth (located to the west of the site) and the valley zone of the River Nete, which flows along the eastern boundary of Duffel. These areas are ecologically significant and are considered important for Biodiversity and water management.

The Entity maintains active engagement with local authorities, residents, and other Stakeholders through environmental permitting processes and sustainability reporting. Key external Stakeholders include the Municipality of Duffel, local residents, several Flemish Environmental Agencies, customers across Europe and beyond, and industry organisations such as the Aluminium Stewardship Initiative (ASI), of which Aluminium Duffel is a certified member under both the ASI Performance Standard and ASI Chain of Custody.

## 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>	High	High	High	HIGH
<b>RISKS</b>	High	High	High	HIGH
<b>PERFORMANCE</b>	High	High	High	HIGH
<b>OVERALL</b>	HIGH			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity's legal department undertakes annual audits on legal compliance and a complete economic and financial information report is available on the website of the National Bank of Belgium.
1.2 Anti-Corruption	Conformance	The Entity has a detailed Code of Conduct that contains business practices and procedures relating to Corruption and Bribery. All office-based workers must participate in and pass regular e-learning modules. A global compliance hotline has also been developed and implemented. The Code of Conduct is available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>
1.3a-e Code of Conduct	Conformance	The Entity has developed a Code of Conduct and refers to the Code on both its website and in its Sustainability Report. The Code is also available at: <a href="https://aluminiumduffel.com/uploads/files/Code-Of-Conduct/Code-of-Conduct-ENG.pdf">https://aluminiumduffel.com/uploads/files/Code-Of-Conduct/Code-of-Conduct-ENG.pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed and implemented an Integrated Management System for environmental, social and governance compliance. Several Policies have been developed including the Code of Conduct, Health, Safety, Security and Environment Policy, and implementation is monitored through the internal auditing system. The Policies are available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a></p> <p>The Entity has senior management commitment for the ongoing implementation of the Management Systems. External audits and evaluations are undertaken to verify the effective implementation of the systems, both by certification bodies and public authorities. Certificates are available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a></p> <p><a href="https://aluminiumduffel.com/uploads/files/Policies/20250305_FV42_HSE-Policy_ENG_Signed.docx.pdf">https://aluminiumduffel.com/uploads/files/Policies/20250305_FV42_HSE-Policy_ENG_Signed.docx.pdf</a></p> <p><a href="https://aluminiumduffel.com/uploads/files/Policies/20250305_Policy-on-People_ENG_Signed.docx.pdf">https://aluminiumduffel.com/uploads/files/Policies/20250305_Policy-on-People_ENG_Signed.docx.pdf</a></p>
2.2a-c Leadership	Conformance	The Entity's Vice President of Business Planning has overall responsibility for ASI. The responsibility for implementation is delegated to the Sustainability Manager. Job descriptions for all functions and roles are available. The job descriptions are available for employees and the management representatives.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity holds a valid ISO 14001:2015 certificate, based on the implemented Environmental Management System. The Certificate is available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System which also addresses Health and Safety as well as work-related issues. Several Trade Unions are present at the Entity and Worker representatives participate in meetings and committees. Periodic external audits are conducted by public authorities.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented both a Responsible Sourcing Policy and a Code of Conduct, which address environmental, social and governance issues. The Code of Conduct must be acknowledged together with the general purchasing conditions by suppliers. All suppliers are evaluated on their performance against these aspects.</p> <p>Responsible Sourcing Policy: <a href="https://aluminiumduffel.com/uploads/files/Policies/Responsible-sourcing-policy_Final_Signed.pdf">https://aluminiumduffel.com/uploads/files/Policies/Responsible-sourcing-policy_Final_Signed.pdf</a></p> <p>Code of Conduct: <a href="https://aluminiumduffel.com/uploads/files/Code-Of-Conduct/Code-of-Conduct-ENG.pdf">https://aluminiumduffel.com/uploads/files/Code-Of-Conduct/Code-of-Conduct-ENG.pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as there have been no recent Major Changes and/or New Projects within the scope of the Entity.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as there have been no recent Major Changes and/or New Projects within the scope of the Entity.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed and implemented an effective Emergency Response Plan. The Plan was developed together with internal and external experts with consent with local operational emergency authorities. Refer to the Sustainability Report 2024:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a contingency plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which considers Material adverse environmental, social and governance impacts. Social plans have been developed based on Belgian law.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>Mergers and Acquisitions are the responsibility of the owner of Aluminium Duffel BV – a private equity firm. The Entity is required to adhere to the rules of Belgian law that guarantee environmental, social and governance rules are strictly followed in the case of a merger or acquisition event. More information is available in the Sustainability Report 2024:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>Closure, Decommissioning and Divestment is the responsibility of Aluminium Duffel BV – a private equity firm. The Entity is required to adhere to the rules of Belgian law that guarantee environmental, social and governance rules are strictly followed in the case of any closure, decommissioning or divestment event.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its annual Sustainability Report for 2024, which is available at:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity registers and provides follow-up on an annual basis, any Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law and internal and external complaints. No fines, other penalties or judgements were imposed on the Entity. It communicates this approach in the 2024 Sustainability Report, page 9:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity complies with national and international laws and regulations relevant to the industry, and broader regulations on preventing Corruption, breaches of trust, fraud or money laundering, as disclosed in the 2024 Sustainability Report.</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p> <p>Further information is provided in the Entity's Annual Accounts Audit Report:</p> <p><a href="https://consult.cbso.nbb.be/consult-enterprise/0403045292">https://consult.cbso.nbb.be/consult-enterprise/0403045292</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has identified its main Stakeholders and interested parties with their main requirements in its Sustainability Report. The Entity has responded to complaints with actions to minimise noise and odour levels. Neighbours can contact the Entity 24 hours a day by phone or email (e.g., <a href="mailto:info.duffel@aluminiumduffel.com">info.duffel@aluminiumduffel.com</a>). Complaints are included in the management review process and are published in the Sustainability Report 2024, pages 27 &amp; 31:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>Life Cycle Assessments (LCAs) are available for the Entity's automotive and non-automotive products and can be requested by customers. Information on LCAs is available in the Sustainability Report 2024 (page 45), where 'cradle-to-gate' and 'gate-to-gate' data are published both for automotive and non-automotive products. The LCAs are externally and independently reviewed:</p> <p><a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has conducted LCAs for its exterior automotive parts SUPERLITE®200, interior automotive parts ECOLITE™ and for non-automotive products. The LCAs were conducted and reported in compliance with ISO 14040:2006 and ISO 14044:2006 Standards. The main results are published in the Sustainability Report 2024, pages 45 and 46: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
4.2 Product Design	Conformance	<p>The Entity has applied its 'Customer To Design (CTD)' tool during the design process to inform product designers of a product's estimated Global Warming Potential (GWP) at an early stage. The Entity communicates this in both the Sustainability Report and in the Sustainability Policy the advantage of Aluminium for Sustainable Products.</p> <p>Sustainability objectives in the design and development processes are defined.</p>



CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets for the recycling of Aluminium Process Scrap and has implemented a plan to recover Scrap from customers (i.e. 'closed-loop' recycling). The target for customer input Scrap is planned to reach 35% (compared with 18% in 2019). Refer to page 47 in the Sustainability Report 2024. The Entity has implemented a procedure for recycling and Aluminium Process Scrap is separated by Aluminium alloys and grades for recycling.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is an active member of European Aluminium (EA) to promote the collection of 'End of Life' vehicle Scrap. Various cooperative actions with EA and Universities are ongoing.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity communicates its Greenhouse Gas (GHG) emissions and energy reduction achievements in its 2024 Sustainability Report. The GHG Emissions for Scopes 1, 2 and 3 have been calculated and disclosed at: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a> Energy consumption and CO <sub>2</sub> eq. Emissions data are independently verified and also approved annually by relevant authorities.
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 GHG Emissions Reduction Plans	Conformance	The Entity reports its GHG Emissions reductions measures, including intermediate targets (and end goal) for 2025-2050 on pages 17 and 39 in the 2024 Sustainability Report: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a> , as well as on the Entity's website at: <a href="https://aluminiumduffel.com/sustainability">https://aluminiumduffel.com/sustainability</a>  The Entity aims to achieve a 38% reduction of CO <sub>2</sub> emissions by 2030 and to achieve 'carbon neutrality' by 2050. The Entity has used the ASI GHG Pathways Calculation Tool which includes a 2023 baseline year to ensure its Pathway is consistent with a 1.5°C warming scenario.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	The Entity publishes time-bound intermediate GHG emissions reduction targets and has implemented a plan to achieve these targets. Refer to the Goals 2025-2050 in the Sustainability Report 2024:

CRITERION	RATING	COMMENT
		<a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>  Whilst the targets, goals, actions and data are all disclosed, the specific emissions reduction pathway and performance against this slope is not yet publicly available.
5.4 GHG Emissions Management	Conformance	The Entity has implemented a GHG Management System, which includes procedures, reduction and monitoring plans, action and activity lists, and verification reports for the Entity's GHG reporting, aligned to the GHG Emissions Reduction Plan and targets developed.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	Relevant air emissions are reported to the Belgian Government on an annual basis and published in the Sustainability Report 2024, page 40: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a> Emissions reduction plans are developed and reviewed on an annual basis.
6.2a-g Discharges to Waters	Conformance	Water is primarily used for cooling as part of the production process. Water discharges are monitored monthly. To mitigate adverse impacts on the environment and human health from Discharges to Water, the Entity has implemented a water treatment process. The environmental program also includes measures to reduce wastewater impact.  A reduction plan has been implemented to evaluate environmental goals and to investigate and evaluate environmental impacts. For further information, refer to the 2024 Sustainability Report, page 56: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Risk analysis is integral to the Entity's Environmental Management System and addresses Emissions to Air, land and water for the rolling mill and Casthouse. Areas with high risk have been identified and plans for reducing risk are implemented.  The Entity has implemented an emergency plan that includes Spills and Leakages. A preventive maintenance system is implemented for regular and risk-based checks of systems and equipment for Leakage and Spills.  The management plan for emergencies, Spills and Leakages is summarised in the 2024 Sustainability Report, page 58: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a> For further information relating to the reporting of, and response taken for any Spills, Stakeholders can contact the Entity at: <a href="https://aluminiumduffel.com/contact">https://aluminiumduffel.com/contact</a>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established a procedure for the handling and reporting of Spills. Environmental incidents are reported to the applicable Governmental Department. Significant environmental incidents including Spills are communicated to neighbours and other important Stakeholders. The only known Spill at the Entity that occurred in 2017

CRITERION	RATING	COMMENT
		<p>was disclosed to the relevant Governmental Department and key Stakeholders.</p> <p>The reporting of Spills is addressed via the Entity's ISO 14001:2015 certified Management System and disclosed in the annual environmental reporting. At the time, there was no incident to be reported.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's waste management framework has been designed according to the Waste Management Hierarchy. The Entity reports its Waste data to the legal authority annually and are disclosed it in the Sustainability Report 2024, pages 54-55:  <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity has implemented a procedure for the handling of Dross and containers are available for each type of Dross for collection in the Casthouse. The collected Dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a subcontractor to be recycled.</p> <p>Waste types, including Dross, are reported in the 2024 Sustainability Report, page 54:  <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and mapped its water withdrawal and use by source and type &amp; conducted a risk assessment to address water-related risks in its Area of Influence as part of the Environmental Management System. There are no significant material water-related risks identified.</p> <p>Water usage and withdrawal are documented in the Sustainability Report 2024, page 56:  <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
7.2a-e Water Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risks and potential impacts on water resources and quality is considered low. However, water management is incorporated into the Entity's Environmental Management System. Water management plans are available in the 2024 Sustainability Report, page 56:  <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A risk assessment and investigation on biodiversity impacts from the Entity's activities and within the Entity's Area of Influence was completed by an external specialist and a detailed improvement plan was developed. The assessment demonstrated there was no significant impact to biodiversity or risks identified. More information is available in the Sustainability Report 2024, page 18: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, whilst a biodiversity improvement plan has been developed, the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services are assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity's Biodiversity study confirmed the presence of Alien Species. The Entity has implemented an Action Plan to eliminate these Alien Species and to prevent reintroduction of the plant species in the future.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that its Area of Influence is not within or adjacent to any World Heritage Properties. There are no operations in World Heritage Areas.
8.6a-d Protected Areas	Conformance	The Entity has confirmed that its Area of Influence is not located within any Protected Areas (e.g. Natura 2000) nor is it located within a water protection area. <a href="https://natura2000.vlaanderen.be/natura-2000-gebieden">https://natura2000.vlaanderen.be/natura-2000-gebieden</a>
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	The Entity communicates in its Sustainability Report 2024 its Code of Conduct and its Policy on People, its commitment to support the protection of internationally proclaimed Human Rights, such as the European Convention on Human Rights and expects that its suppliers do the same. All documents are available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>  The Entity requests its suppliers to comply with the Code of Conduct. The Entity has introduced processes to comply with the conflict mineral disclosure obligations. The Entity conducted a supplier survey to identify potential risks and the negative impact of its suppliers on Human Rights, and no adverse Human Rights impacts were identified. The Entity has identified and addressed the topics of its main Stakeholder groups in the Sustainability Report. The main suppliers of

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		material to the Entity are ASI Certified. See Sustainability Report 2024, pages 14 and 26: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Code of Conduct and a Policy on People, which address the commitment to not tolerate any form of Discrimination and to respect gender diversity. Issues and actions related to diversity are reported in the Sustainability Report 2024, page 28: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium.
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, as there are no Indigenous Peoples in Belgium.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium and there is no cultural and sacred heritage affected.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in Belgium and there is no cultural and sacred heritage affected.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone and does not have any New Projects or Major Changes that require resettlement. No displacements have occurred.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity is in regular contact with its neighbours and conducts periodic consultations (e.g. over 300 families received an invitation to participate in neighbour consultations). Stakeholders and their interests are identified and mapped in the Sustainability Report. All rights of the neighbours are covered by Belgian law.</p> <p>It has identified noise and odour as the main causes for complaints, more information is disclosed in the Sustainability Report 2024, page 32: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity implemented a Code of Conduct, which is to be signed by suppliers. A Responsible Sourcing Policy is available on the Entity's website. Supplier risk assessments and supplier audits are performed on a regular basis. The Entity's Supplier due diligence is updated regularly. Supplier certificates are regularly checked on the ASI homepage.

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		The Entity's Code of Conduct and Responsible Sourcing Policy are available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity performs risk-based Due Diligence over its supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) to identify and assess risks in the supply chain.</p> <p>Areas of origin or transit of Bauxite from potential CAHRAs are tracked and regularly monitored. For all relevant suppliers, a central risk assessment is performed and is updated at least once a year.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented a Code of Conduct, which is to be signed by suppliers. A Responsible Sourcing Policy is available on the Entity's website. Supplier risk assessments and supplier audits are performed on a regular basis. The Entity's Supplier due diligence is updated on a regular basis. Supplier certificates are regularly checked on the ASI homepage. The supply chain assessment process 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 processes were included in the scope of this ASI Performance Standard Certification Audit and address this requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity has performed supplier audits and CoC Due diligence supplier risk assessments. There have been no hazard signals in the supply chain and the Entity maintains good relationships with all material suppliers.</p> <p>Information on the Entity's supply chain Due Diligence is presented in the Sustainability Report 2024, pages 27 and 48:  <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p>
9.9 Security practice	Conformance	Security is provided through the Entity's personnel, who are trained accordingly and are required to pass an exam. The Entity has implemented a Code of Conduct for security personnel and security-specific risks are assessed and verified as to whether the security policy is coherent and relevant.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has established Social and Ethical Management Standards which include a policy on the rights of Workers to associate freely in Labour Unions in line with ILO Conventions C87 and C98. The Entity's employee handbook is provided to all Workers as part of the training program, which includes these policies and procedures.</p> <p>The Entity respects the rights of Workers to Collective Bargaining, they participate in the Collective Bargaining process and adhere to Collective Bargaining Agreements.</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 the country (Belgium) where the Entity operates and is located.

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10.2a Child Labour	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. Teenagers as young as 15 can only work in Non-Hazardous administrative positions under the supervision of a team leader. The Entity prohibits the hiring of persons under 18 years for positions requiring hazardous work. Refer to the 2024 Sustainability Report, page 33: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
10.3a-c Forced Labour	Minor Non-Conformance	<p>Forced Labour is prohibited in Belgium. The Entity communicates its position in the Sustainability Report 2024 (page 27) and within its Code of Conduct. The Entity requires its suppliers to be compliant with these requirements. The Entity does not require any deposits, fees or advances from its employees, and requires its suppliers to address Forced Labour and Modern Slavery.</p> <p>The Entity does not retain Workers' original documents and only copies of identity papers and passports are kept. The Entity is not involved in Forced Labour. Notification for the termination of the working contract is regulated by Belgian law.</p> <p>Whilst the Entity addresses and references Modern Slavery in its processes and procedures, it has not yet developed a 'stand-alone' Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	Discrimination is prohibited by Belgian law. The Entity does not tolerate Discrimination at the site nor by its suppliers and communicates this commitment in the Sustainability Report and Code of Conduct. Refer to: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>
10.5 Communication and engagement	Conformance	The Entity has established direct communication channels between management, Workers and their representatives. Workers can contact their representatives or five nominated trust persons to discuss issues on their behalf. A 'whistleblower' hotline for reporting issues has been established and its availability is communicated internally and externally. Further information is available in the Sustainability Report 2024, page 31: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
10.6a-g Violence and Harassment	Conformance	Violence and Harassment are forbidden under Belgian law. The Entity has documented the permitted disciplinary procedures in the work rules. Implementation of these procedures was verified during the interviews with Workers, independent Worker representatives and Human Resources managers. The Entity's Code of Conduct is available at: <a href="https://aluminiumduffel.com/downloads">https://aluminiumduffel.com/downloads</a>
10.7a-c Remuneration	Conformance	<p>The Entity's wages are regulated through the Collective Bargaining Agreement of the sector. The Entity provides additional financial and non-financial benefits for the employees. The Entity requires its suppliers to pay at least minimum wages in accordance with local law and to ensure the compensation of living wages according to the local living conditions.</p> <p>All payments are documented and submitted monthly to employees' bank accounts.</p>
10.8a-c Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working schedules are part of the Entity's work rules

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		and are respected (e.g. an average of one day off per seven-day period).
10.9a-b Informing Workers of Rights	Conformance	The Entity has an onboarding process for employees in place in which Workers are informed about their rights.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an ISO 45001 certified Occupational Health and Safety (OH&S) Management System. Health and Safety performance is addressed in the Sustainability Report 2024, pages 21-25: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity is certified against ISO 45001 and has a documented OH&amp;S Management System in place. Information on accident and incident figures are available in the Sustainability Report 2024, pages 21 and 22: <a href="https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf">https://aluminiumduffel.com/uploads/files/Sustainability-Reports/06_ALUMINIUM-DUFFEL-Duurzaamheidsrapport-2024-w.pdf</a></p> <p>The Entity's overall OH&amp;S performance is on average the industry average compared to its peers. Refer to page 25 in the 2024 Sustainability Report.</p> <p>Whilst the Entity tracks and internally reports performance indicators such as Lost Time Injury (LTI), LTI Frequency Rates (LTIFR) and Medical Treatment Cases, there are currently not publicly disclosed, and neither the results from peer comparison.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity conducts monthly Safety Committee meetings to review incidents and observations. The Safety Committee consists of representatives of 'blue-collar' and 'white-collar' Workers, Human Resources Departments and other members of the management team.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 August 2020	Initial Certification Audit – Full Certification
1	18 August 2021	Transfer of Certification to Alvalance Aluminium Duffel BV from Novelis Duffel (formerly Aleris Duffel) – Provisional Certification Next Audit Type and Next Audit Date revised to Surveillance Audit (29 December 2021)



2	11 March 2022	Surveillance Audit
3	15 August 2022	Re-Certification Audit – Full Certification Revised the Certification Scope to align with the Entity's ISO certifications. Note: Following the Re-Certification Audit and prior to the issue of the Full Certification, the Entity was acquired by American Industrial Partners on 14 June 2022 and the facility name was changed to Aluminium Duffel BV.
4	16 August 2022	Transfer of Certification to Aluminium Duffel BV following acquisition of Alvance Aluminium Duffel BV – Provisional Certification
5	25 May 2023	Surveillance Audit – Full Certification (revert to existing Certification Period as per ASI requirement for acquisitions)
6	31 July 2025	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply PS V3.1.

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