

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Constantia Alucap

CERTIFICATE NUMBER

535

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

20 MARCH 2026

CERTIFICATION LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

19 MARCH 2029

ASI ACCREDITED  
AUDITING FIRM

BUREAU VERITAS  
CERTIFICATION

CERTIFIED SINCE

20 MARCH 2026

## AUTHORISED BY

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

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

Manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l., located in Borgo Valsugana (Trento), Italy.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Constantia Flexibles International GmbH
ENTITY NAME	Constantia Alucap
CERTIFICATION SCOPE	Manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l., located in Borgo Valsugana (Trento), Italy.
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	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>27 – 29 August 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>19 January 2026</li></ul>
AUDIT SCOPE	<p>The Audit Scope includes the manufacture of flexible packaging materials, including die-cut lids and printed die-cut lids and reels, made from lacquered Aluminium, laminated Aluminium with plastic films (PE, PP and PET), and lacquered plastic films (PET) for food and non-food applications, using flexographic printing and die-cutting techniques at Constantia Alucap S.r.l., located in Borgo Valsugana (Trento), Italy.</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></ul>

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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 20 March 2026 – 19 March 2029

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 19 September 2027

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CERTIFICATE NUMBER 535

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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

Constantia Alucap (the 'Entity') is part of the Constantia Flexibles International GmbH Group and specialises in the production of printed die-cut lids and reels made of Aluminium and plastic film. The application of 'state-of-the-art' technology allows the Entity to achieve the highest standard in term of quality and performance, required for foodstuff packaging. The Entity is located in Borgo Valsugana, near Trento, Italy and is close to Central European markets as well as areas with the most significant yoghurt and dairy production throughout Italy. The Entity is surrounded predominantly by agricultural lands with the nearest residents located within 100 metres of the Entity.

The Entity is one of the biggest employers in the area as the number of employees has grown significantly in the last five years, currently employing approximately 80 Workers, an increase of nearly 30 since 2020. The Entity currently manufactures approximately 2.2 billion lids per annum and has an annual turnover of approximately 20 million Euro.

## 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>	High	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity conducts annual controlled self-assessments on the fulfilment of legal requirements, which are verified by the Constantia Flexibles Group and the internal Supervisory Board.
1.2 Anti-Corruption	Conformance	The Entity has implemented a well-established system to mitigate Corruption, including Bribery, in all its forms. An anti-Corruption guideline has been developed, and employees must participate in web-based training and pass examinations. There is a global 'whistleblowing' hotline and dedicated whistleblowing site. Refer to: <a href="https://constantiaflexibles.gan-compliance.com/p/Speakup">https://constantiaflexibles.gan-compliance.com/p/Speakup</a>
1.3a-e Code of Conduct	Conformance	The Entity has developed a Code of Conduct of which Workers receive annual refresher training. The Code of Conduct is communicated internally and is available for all Stakeholders at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=2762&amp;cHash=a286260245bc46a8a71aa72cbdc39d96">https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=2762&amp;cHash=a286260245bc46a8a71aa72cbdc39d96</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity implements the Constantia Flexibles Group Policies, including the Code of Conduct, Environmental Policy, and Health, Safety, Security and Environment Policy, the implementation of which is monitored through Constantia Flexibles' internal audit system with the Entity's self-assessment and further risk-based audits are undertaken by Constantia Flexibles.  These Policies are communicated externally at: <a href="https://www.cflex.com/sustainability">https://www.cflex.com/sustainability</a>  All Policies and associated documentation are available to all Workers via the Entity's SharePoint® based intranet.
2.2a-c Leadership	Conformance	The Entity has appointed the Plant Manager as the person responsible for the implementation of the ASI Performance Standard and ongoing compliance with the Standard. The role is supported by the Constantia Flexibles Headquarters.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity's Management System is based upon the Group-wide Constantia Flexibles Management System. All Workers receive training on environmental-related issues and risk management.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity's Management System is based upon the Group-wide Constantia Flexibles Management System. All Workers receive training on social-related issues and risk management, and there is internal employee representation at the management review.
2.4a-e Responsible Sourcing	Conformance	The Entity is firmly committed to responsible procurement (e.g. it is a founding member of ASI and supporter of numerous other initiatives). It communicates its commitment in the Constantia Flexibles sustainability portfolio. The Entity is regularly evaluated by EcoVadis

CRITERION	RATING	COMMENT
		<p>and participates in the Carbon Disclosure Project (CDP). Responsible procurement is implemented at a Group level.</p> <p>The Entity's Ethical Sourcing Policy is available at:  <a href="https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=1515&amp;cHash=2fc052d571f246766aaf7930426dc245">https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=1515&amp;cHash=2fc052d571f246766aaf7930426dc245</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 significant changes or New Projects over the previous three years.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as there have been no significant changes or New Projects over the previous three years.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed and implemented a series of emergency response plans. These include crisis management, communication guidelines, insurance company assessments, on-site fire department, and annual training courses. Emergency plans are available upon request.
2.8a-d Suspended Operations	Conformance	The Entity has developed and implemented a business resilience plan for all areas. A holistic risk assessment (i.e. 'Risk Run') is conducted by the Risk Manger on an annual basis. Senior Management reviews the results of the 'Risk Run' and defines mitigation measures as required.
2.9a-b Mergers and Acquisitions	Conformance	All mergers and acquisitions are managed by the Constantia Flexibles Group. Group procedures are relevant to the Entity, however the Due Diligence process is managed and organised by the Constantia Flexibles Group.
2.10a-b Closure, Decommissioning and Divestment	Conformance	All closures, divestments and disposals are managed by the Constantia Flexibles Group. Group procedures are relevant to the Entity, however the Due Diligence process is managed and organised by the Constantia Flexibles Group.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>Constantia Flexibles provides sustainability data to platforms such as EcoVadis and the Carbon Disclosure Project, where both verify and evaluate these data. Entity- and Product-specific sustainability data are provided to customers. Additionally, sustainability-related performance information is available in the Constantia Flexibles' ESG Report 2023. Refer to:  <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity leverages off a well-established Group system to avoid legal non-compliances and liabilities. Information on any non-compliances is available in the ESG Report 2023. Refer to:  <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>A clear system of policies and procedures relating to anti-Corruption and Bribery is incorporated across the Entity's Management System. A detailed system of reporting and internal audits ensures compliance at both the Group and Entity levels.</p> <p>Code of Conduct:  <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=47c8fda4bf17e893a7fbb9e75145d9de</a></p> <p>Code of Conduct for Suppliers and Subcontractors:  <a href="https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=851&amp;cHash=b971265fb5a83a90958e3a0ed47f5ea">https://www.cflex.com/downloads/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=851&amp;cHash=b971265fb5a83a90958e3a0ed47f5ea</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>Internal and external consultation mechanisms (including Workers' Councils and telephone complaint lines) are available. Detailed information is available on the Constantia Flexibles website and within the Code of Conduct. Complaints and grievances can be submitted to the Entity via: <a href="https://constantiaflexibles.com-compliance.com/p/Speakup">https://constantiaflexibles.com-compliance.com/p/Speakup</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>Constantia Flexibles provides Life Cycle Assessment (LCA) information with a semi-automatic approach, based on the product and product data of the plant in question. The tool has been certified by a third-party organisation (SGS). The Entity's customers receive Product-specific LCAs.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity prepares LCA information for its clients and presents the results in a clear format covering both 'cradle-to-gate' and 'cradle-to-grave' scenarios. Publicly available information is available at: <a href="https://www.cflex.com/sustainability/corporate-sustainability">https://www.cflex.com/sustainability/corporate-sustainability</a></p>
4.2 Product Design	Conformance	<p>The Entity communicates clear reduction targets, e.g. in its CSR brochure (-40% CO<sub>2</sub> emissions by 2023 and 100% recyclable products by end 2025). The Entity provides its clients with data at their request and works with these to make Product design adjustments where required.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented clear working practices for the separate collection of Aluminium foil and laminates. Aluminium waste is identified and tracked as a Key Performance Indicator throughout the Facility.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity informs its customers about opportunities to influence the recycling rate through product design and additional product information. The Entity's general recycling strategy is available at: <a href="https://www.cflex.com/sustainability/product-sustainability/recyclable-packaging">https://www.cflex.com/sustainability/product-sustainability/recyclable-packaging</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has established clear objectives for internal Aluminium recycling and is involved in industry-wide project groups and initiatives, including 'CEFLEX', which is engaged in the development of</p>

CRITERION	RATING	COMMENT
		collection and reconditioning infrastructure for post-consumer flexible packaging throughout Europe.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity communicates its achievements in terms of Greenhouse Gas (GHG) emissions and energy reduction on its website and in the Wendel Group Sustainability Report, 'Wendel Universal Registration Document 2022', on page 205, available at: <a href="https://www.cflex.com/sustainability/">https://www.cflex.com/sustainability/</a></p> <p><a href="https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf">https://www.wendelgroup.com/wp-content/uploads/2023/04/wen-2022-urd-en-v-mel-230421.pdf</a></p> <p>These data are also reported to public authorities and other platforms including EcoVadis and Carbon Disclosure Project (CDP), which provide verification and evaluation of the data. Refer to Constantia Flexibles ESG Report 2023, available at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Constantia Flexibles Group has committed to reduce CO<sub>2</sub> emissions by 24% by 2030 and 49% by 2049. The Entity monitors its energy and GHG emissions within its ISO 50001 Energy Management System, through energy audits and preparation of regular consumption reports. Data are available at: <a href="https://www.cflex.com/sustainability/corporate-sustainability">https://www.cflex.com/sustainability/corporate-sustainability</a></p> <p>and in the ESG Report: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p> <p>Whilst the Entity has developed a GHG Emissions Reduction Plan and ensures a GHG Emissions Reduction Pathway that is consistent with a global warming scenario of less than 1.5°C, it has not assessed and confirmed that the methodology used is consistent with the ASI-endorsed methodology.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a corporate value chain accounting system for emissions in scopes 1, 2 and 3 according to the GHG protocol and has incorporated its reduction targets, associated actions and initiatives for emissions and programmes into its Environmental Programme. This Programme is reviewed annually by external experts.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Conformance	All Material air emissions are measured and reported to local relevant authorities. For more information, refer to the Constantia Flexibles ESG Report 2023: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a>
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity discharges wastewater in accordance with relevant legal authorisations. Water reduction targets have been defined and progress is monitored by the parent company. The authorisation documentation for the discharge of 'first flush' rainwater however is not currently available.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The main risks relating to Spills and Leakages have been identified in the Entity's environmental risk assessment. Alert plans for these main risks are available, and training has been provided to relevant Workers. Internal audits are conducted to identify any potential for Spills and Leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Alert plans are available for different types of risk and training has been provided to relevant Workers. Internal audits are conducted to identify any potential for Spills and Leakages. Crisis management includes environmental alerts with information to the authorities and the local community according to the severity of the incident. The authorities are informed in case of potential large-scale contamination events.
6.5a-c Waste Management and Reporting	Conformance	The Entity has established clear reduction targets based on the collection of Hazardous and Non-Hazardous Waste and KPIs are defined. Reporting on waste management is in accordance with Italian legislative requirements. Data are reported to the authorities via Annual Waste Declarations. Further information on waste management and quantities is available in the Constantia Flexibles ESG Report 2023, page 36: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a>
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.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors the consumption and withdrawal of water from the municipal mains supply. Water consumption is considered an KPI and is monitored accordingly via the Environmental Programme 2024 KPI chart with stable water consumption.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as there are no significant risks associated with its water consumption.

CRITERION	RATING	COMMENT
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	The Entity is located near a known Protected Area and as such, special attention is afforded by the Entity to the protection of the environment and Biodiversity. An external technical specialist consultant has conducted a detailed analysis of the Biodiversity and ecosystem setting and potential risks has been undertaken. This analysis will also include potential actions required to ensure the protection of biodiversity features. At the time of the Audit, the assessment and action plan however was still in draft with no implementation undertaken to date.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	The Entity is located near a known Protected Area and as such, special attention is afforded by the Entity to the protection of the environment and Biodiversity. An external technical specialist consultant has conducted a detailed analysis of the Biodiversity and ecosystem setting and potential risks has been undertaken. This analysis will also include potential actions required to ensure the protection of biodiversity features. At the time of the Audit, the assessment and action plan however was still in draft with no implementation undertaken to date.
8.2a-g Biodiversity Management	Minor Non-Conformance	The Entity is located near a known Protected Area and as such, special attention is afforded by the Entity to the protection of the environment and Biodiversity. An external technical specialist consultant has conducted a detailed analysis of the Biodiversity and ecosystem setting and potential risks has been undertaken. This analysis will also include potential actions required to ensure the protection of biodiversity features. At the time of the Audit, the assessment and action plan however was still in draft with no implementation undertaken to date.
8.3a-c Management of Priority Ecosystem Services	Minor Non-Conformance	The Entity is located near a known Protected Area and as such, special attention is afforded by the Entity to the protection of the environment and Biodiversity. An external technical specialist consultant has conducted a detailed analysis of the Biodiversity and ecosystem setting and potential risks has been undertaken. This analysis will also include potential actions required to ensure the protection of biodiversity features. At the time of the Audit, the assessment and action plan however was still in draft with no implementation undertaken to date.
8.4 Alien Species	Conformance	The Entity periodically monitors its operations for any known and potential infestation of noxious species on site. There is currently no transportation of material to and from the Entity from regions outside the Entity's current biome.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has determined that it does not operate in or adjacent to World Heritage areas, and any future expansion of the Entity's activities would not encroach upon a World Heritage Property.
8.6a-d Protected Areas	Conformance	Protected Areas are identified by public authorities. All regulations for these areas are complied with by the Entity. Regulatory requirements are integrated into the risk assessment, management plans and emergency response plan.

CRITERION	RATING	COMMENT
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	<p>The Constantia Flexibles Group commits all its facilities, including the Entity, in its Code of Conduct to respect Human Rights. The Entity produces an annual report on Discrimination in recruitment. Monthly gender gap analysis is updated and reported to the Groups' parent company. Refer to Code of Conduct at:</p> <p><a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0">https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0</a></p> <p>Supply Chain Code of Conduct:</p> <p><a href="https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=586&amp;cHash=199dbf568062dc4663cde377a772476">https://www.cflex.com/sustainability/corporate-sustainability/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=586&amp;cHash=199dbf568062dc4663cde377a772476</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is committed in the Code of Conduct to prohibiting Discrimination and Harassment, and as such, equal opportunity is an integral part of its human resources strategy. The Entity produces an annual anti-Discrimination report. For further information on the Entity's equal opportunity initiatives and performance, refer to the 2023 ESG Report Chapter entitled 'Promoting Diversity and Equal Opportunities'.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as Indigenous Peoples or their lands, territories and resources are not present or 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 present or 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 present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as it has assessed and confirmed that there are no cultural or sacred heritage sites or values present within its Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as it has assessed and confirmed that there are no cultural or sacred heritage sites or values present within its Area of Influence.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it was confirmed during the Audit that its operations have not displaced any vulnerable or at-risk individuals present in its Area of Influence.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is in regular contact with and hold a sound relationship with the surrounding communities. Most of the Entity's Workers are from the area and come from villages close to the Facility.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has implemented a third-party Due Diligence process and a Code of Conduct for suppliers. Most of the Entity's suppliers are ASI certified.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a third-party Due Diligence process and a Code of Conduct for suppliers. Most of the Entity's suppliers are ASI certified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a third-party Due Diligence process and a Code of Conduct for suppliers. Most of the Entity's suppliers are ASI certified. The Group's Internal Audit department conducts internal audits that also examine sanctions and commercial controls. Appropriate measures are defined for the risks identified.
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	Minor Non-Conformance	The Entity has implemented a third-party Due Diligence process and a Code of Conduct for suppliers and subcontractors. The Group's Internal Audit department conducts internal audits that also examine sanctions and trade controls. Appropriate measures are defined for the risks identified, however the results of the supply chain Due Diligence are not yet publicly available.
9.9 Security practice	Conformance	Security at the Entity is provided via its own personnel. These personnel are specifically trained in the Code of Conduct and must demonstrate ongoing compliance to the principles contained within the Code.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity is committed to respecting Workers' rights in its Code of Conduct and demands the same from its suppliers. There are two Workers' representatives each of whom are freely elected.
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 Freedom of Association and the Right to Collective Bargaining are not restricted in Italy, where the Entity conducts its activities.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in Italy. Young Workers (aged between 16 and 18) are subject to special protection under the apprenticeship programme and are not allowed to work in hazardous working

CRITERION	RATING	COMMENT
		<p>environments. The Entity is committed to and expects its suppliers to respect the ban on Child Labour.</p> <p>Refer to the Entity's Code of Conduct: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0">https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=850&amp;cHash=0f742f70dd8237f312e7cc162f7400d0</a></p>
10.3a-c Forced Labour	Conformance	<p>The Entity is committed to and expects its suppliers to respect the prohibition of Forced Labour, slavery and Human Trafficking. All Workers are hired directly or through recognised employment agencies, which provide all necessary documentation. Workers are Italian citizens or have permanent rights to work and reside in Italy. No deposits or security payments are allowed. There are no restrictions on the movement of Workers throughout the site.</p> <p>The Entity's Human Resources Department does not retain original documents, only copies of documents such as identity papers and passports, in Workers' files. The timeframe for announcing termination of employment is regulated by the collective labour agreement for the sector.</p> <p>The Entity is covered under the Group-wide Slavery and Human Trafficking Statement, available at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=849&amp;cHash=e1859cf85415ff91b3f6fbc6481c620">https://www.cflex.com/general-terms-conditions/code-of-conduct/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=849&amp;cHash=e1859cf85415ff91b3f6fbc6481c620</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity guarantees equal opportunities and does not engage in, nor supports Discrimination or any other conditions that may give rise to Discrimination. This has been confirmed through interviews and examination of documents. The Entity states in its Code of Conduct that Discrimination is not tolerated either at the site, or in its supply chain, and it periodically submits data on Discrimination to the parent Company.</p>
10.5 Communication and engagement	Conformance	<p>Direct and frequent communication is established with Workers and Workers' representatives. Those interviewed spoke of a positive working environment and direct communication.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity states in the Code of Conduct that it does not tolerate any form of punishment and Harassment. It requires its suppliers to comply with the Code of Conduct. Disciplinary measures are regulated by law and require written evidence and the involvement of trade union representatives Code of Conduct. Wages are regulated by the sector's collective labour agreement. The Entity offers additional financial and non-financial benefits to employees.</p> <p>Refer to Section 5.4.5 of the Entity's Code of Conduct: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a></p>
10.7a-c Remuneration	Conformance	<p>Salaries are regulated by the collective labour agreement for the sector. The Entity offers additional financial and non-financial benefits to employees. All payments are documented and sent to employees' bank accounts at the end of each month.</p>

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10.8a-c Working Time	Conformance	Working hours are recorded electronically and paid with bonuses. Working hours are monitored and comply with the Italian laws relating to working hours.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and human resources management during the Audit, Workers in the Entity are informed on Human and Labour Rights during the induction process and information through the Trade Union.

## 11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>Constantia Flexibles commits the entire Group, including the Entity, in its Code of Conduct to Health and Safety. The Entity produces an Annual Report on the status of the prevention and protection system. The Code of Conduct is available at: <a href="https://www.cflex.com/general-terms-conditions/code-of-conduct/">https://www.cflex.com/general-terms-conditions/code-of-conduct/</a></p> <p>The Entity's Health and Safety Policy is available at <a href="https://www.cflex.com/sustainability/health-safety-security-and-environment/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=775&amp;cHash=91f6319c0708c586b1f6ca18aa00e499">https://www.cflex.com/sustainability/health-safety-security-and-environment/cflex?tx_dwboilerplate_cflex%5Baction%5D=download&amp;tx_dwboilerplate_cflex%5Bcontroller%5D=Cflex&amp;tx_dwboilerplate_cflex%5Bfile%5D=775&amp;cHash=91f6319c0708c586b1f6ca18aa00e499</a></p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Relevant Key Performance Indicators (KPIs) are monitored and documented by the Entity and published in the ESG Report, available at: <a href="https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf">https://www.cflex.com/fileadmin/user_upload/MediaLibrary/Newsroom/News/A_closer_look_at_our_2023_ESG_achievements/Constantia_Flexibles_ESG_Report_2023.pdf</a></p> <p>A comparative analysis of performance with peers and leading practices is not yet publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity undertakes an ongoing proactive employee co-involvement in the Health and Safety management system. One safety week is planned every year in which the Workers' safety representative is actively involved. Health and Safety meetings are held periodically to discuss safety conditions and risks.

### ASI LIMITATION OF LIABILITY DISCLAIMER

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 March 2026	Initial Certification Audit – Full Certification