

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Erbslöh Aluminium GmbH

CERTIFICATE  
NUMBER

255

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3.1 2023)

DATE OF ISSUE

7 FEBRUARY 2026

CERTIFICATION  
LEVEL

PROVISIONAL  
CERTIFICATION

DATE OF EXPIRY

6 FEBRUARY 2027

ASI ACCREDITED  
AUDITING FIRM

DQS CFS

CERTIFIED SINCE

7 FEBRUARY 2023

AUTHORISED BY

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

Development, sales, and  
production of Aluminium profiles  
and embossed sheets for industrial  
applications and the automotive  
market at the Hemer site  
(Germany) and two sites in Velbert  
(Erbslöh and Walzwerk, Germany).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Erbslöh Aluminium GmbH
ENTITY NAME	Erbslöh Aluminium GmbH
CERTIFICATION SCOPE	Development, sales, and production of Aluminium profiles and embossed sheets for industrial applications and the automotive market at the Hemer site (Germany) and two sites in Velbert (Erbslöh and Walzwerk, Germany)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</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 (14 -16 December 2022)</li><li>Surveillance Audit (29 - 30 July 2024)</li><li>Re-Certification Audit and Scope Change (16 - 17 December 2025)</li></ul>
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none"><li>14 – 16 December 2022 (Initial Certification Audit)</li><li>29 – 30 July 2024 (Surveillance Audit)</li><li>16 – 17 December 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>10 January 2023 (Initial Certification Audit)</li><li>16 August 2024 (Surveillance Audit)</li><li>19 December 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 16 December 2022)</u></p> <p>The Audit Scope covers the development, sales, manufacturing, mechanical and surface finishing of Aluminium extruded profiles for the industry market and automotive suppliers. And for the manufacturing of Aluminium dession sheets in Velbert (two locations) and Hemer (one location), Germany.</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><li>Material Conversion</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

---

Surveillance Audit (29 – 30 July 2024)

The Audit Scope covers the development, sales, manufacturing, mechanical and surface finishing of Aluminium extruded profiles at Velbert (two locations) and Hemer, Germany.

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (16 – 17 December 2025)

The Audit Scope covers the development, sales, manufacturing, mechanical and surface finishing of Aluminium extruded profiles at Velbert (two locations) and Hemer, Germany.

Supply chain activities included in the Audit Scope:

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

All applicable criteria in the ASI Performance Standard and criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.

---

AUDIT OUTCOME

- Provisional Certification

---

AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

---

CERTIFICATION PERIOD

7 February 2026 – 6 February 2027

---

NEXT AUDIT TYPE

Surveillance Audit

---

NEXT AUDIT DATE

6 August 2026

---

CERTIFICATE NUMBER

255



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

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

---

---

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

---

## ENTITY OVERVIEW

The key processes of Erbslöh Aluminium GmbH (the "Entity") include billet Casting, extrusion, heat treatment, mechanical processing and anodising. The Entity's automotive product range comprises extruded Aluminium profiles for window trims and roof rails or extruded and functionally coated flat tubes for air conditioning condensers, evaporators, and electric vehicle battery cooling systems. The Entity's industrial products range comprises Aluminium products for furniture, appliances, consumer electronics and bicycle components.

The Entity currently employs approximately 450 persons, with Head Office located in Velbert, Germany and manufacturing plants located in Velbert and Hemer at the following localities:

- Erbslöh Aluminium GmbH, Siebeneicker Str. 235, 42553 Velbert
- Erbslöh Aluminium GmbH, Ringstr. 29-31, 42553 Velbert
- Erbslöh Aluminium GmbH, Hönnetalstr. 291, 58675 Hemer

## MATURITY RATINGS

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

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

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to maintain awareness of and ensure Compliance with Applicable Law and other requirements. A register of legal and other applicable requirements within a web-based platform (Quentic) is available and up to date, including all relevant laws and regulations. The procedure 'Umwelt und Energiemanagement Rechtliche und andere Forderungen' (Environment and energy management Legal and other requirements) for regularly evaluating Compliance with Applicable Law and monitoring and communicating changes in Applicable Law is established and implemented.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery. The Entity has established requirements for anti-Corruption including the Code of Conduct: <a href="https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf">https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf</a></p> <p>The Code of Conduct for Suppliers and Business Partners is available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf</a></p> <p>Stakeholders can engage the contracted ombudsman or the Whistleblower hotline upon identification of any potential cases. The Ombudsman Office and Whistleblower system is available via: <a href="https://www.compliance-aid.com/wkw">https://www.compliance-aid.com/wkw</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established and implemented a Code of Conduct (<a href="https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf">https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf</a>) and a Code of Conduct for Suppliers and Business Partners which is incorporated in company's contracts (<a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf</a>).</p> <p>Both documents are reviewed annually during the management review and when significant changes occur. No indication of a control gap has been observed.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established and implemented several Environmental, Social, and Governance related Policies and are available at:</p> <p>Occupational Health and Safety Policy (<a href="https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement">https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement</a>)</p> <p>Environmental Policy/Statement (<a href="https://www.wkw-group.com/nachhaltigkeit/umweltmanagement">https://www.wkw-group.com/nachhaltigkeit/umweltmanagement</a>)</p> <p>Energy Policy/Statement (<a href="https://www.wkw-group.com/nachhaltigkeit/energiemanagement">https://www.wkw-group.com/nachhaltigkeit/energiemanagement</a>)</p> <p>Corporate Policy / Unternehmenspolitik (<a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.2-001_Unternehmenspolitik_FINAL_signed.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.2-001_Unternehmenspolitik_FINAL_signed.pdf</a>)</p>

CRITERION	RATING	COMMENT
		<p>The Policies are communicated internally via information boards, intranet, notices and emails. Training on the Policies is provided to all employees.</p> <p>A review of all Policies is conducted during management review at board level, at least once a year, or if significant changes occur. There is no indication of a control gap.</p>
2.2a-c Leadership	Conformance	<p>The responsibilities of the members of the Board of Management and the management of the Entity are outlined in the organisational charts. Policies and related communications are established and signed by management. All resources necessary for the further development and maintenance of the Management System are provided by the management of Walter Klein Wuppertal (WKW) Group and/or Erbslöh Aluminium GmbH. Within the Code of Conduct, the Entity commits itself to conformance with ASI requirements.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented Management Systems that are certified according to ISO 14001 and ISO 50001. The certificates are available at: <a href="https://www.wkw.de/downloads">https://www.wkw.de/downloads</a></p> <p>A risk analysis was undertaken in accordance with SA 8000 (Social Accountability 8000) Standard.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity's Social Management System is a part of its Integrated Management System. It is divided into the Health and Safety Management System (developed according to ISO 45001) and the Social Management System (developed according to international and national regulations and standards including SA 8000). The Social Management System is not yet certified.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Code of Conduct for Suppliers and Business Partners refer to responsible sourcing, available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_IF.pdf</a></p> <p>The Code is reviewed during the annual management review, or if significant changes occur. Risks are evaluated within the risk management</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>The Criterion is not applicable to the Entity, as there currently are no New Project or Major Change to existing Facilities.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>The Criterion is not applicable to the Entity, as there currently are no New Project or Major Change to existing Facilities.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established an Emergency Response Plan (ERP) as part of the Integrated Management System certified according to ISO 45001 Standard: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/ISO_45001/00196_-_WKW_Aktiengesellschaft_-_CERTIFICATE_-_deutsch_-_2022-12-16_-_O...pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/ISO_45001/00196_-_WKW_Aktiengesellschaft_-_CERTIFICATE_-_deutsch_-_2022-12-16_-_O...pdf</a></p> <p>A process description addressing emergency management and an overview of critical infrastructure is available. The alarm plan is based on the risk analysis and environmental aspect evaluation.</p>

CRITERION	RATING	COMMENT
		Emergency drills are conducted frequently, and annual safety and fire protection instruction for all employees is conducted. First aiders are nominated and trained. The ERP is shared with e.g. the local authorities and the fire department.
2.8a-d Suspended Operations	Conformance	The Entity has conducted an integrated internal and external topic risk analysis according to ISO 14001 and IATF Standards, including social topics. It is reviewed during the annual management review or if significant changes occur. The Entity has established a procedure that defines processes in case of suspension or when factors outside its control significantly alter operations. A Works Council and Trade Union are in place to manage social matters in the event of Suspended Operations.
2.9a-b Mergers and Acquisitions	Conformance	There are currently no mergers or acquisitions planned. Should this occur, all relevant issues will be considered as part of the Entity's Due Diligence process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity considers Environmental and social issues in the planning process for decommissioning and alterations. There are currently no plans for closure or decommissioning.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	Every second year, a comprehensive Sustainability Report is prepared and made available online at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a>  Relevant data required by the ASI Performance Standard are integrated in the Sustainability Report.
3.2 Non-compliance and Liabilities	Minor Non-Conformance	All government reports including inspection reports and notices of violations are communicated to the affected areas when they occur within the Entity. The information is available within the 2023 Sustainability Report and/or the annual management review. There have been no fines or judgements received to date. <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a>  Due to the biannual publication of the Sustainability Report however, information on non-compliance and liabilities are not disclosed annually.
3.3a-c Payments to Governments	Minor Non-Conformance	All information related to Payments to Governments are disclosed in the 2023 Sustainability Report: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a>  The Entity confirms there no payments made to governments / political parties as defined in the Sustainability Report.  Due to the biannual publication of the Sustainability Report however, information related to Payments to Governments are not disclosed annually.
3.4a-f Stakeholder Complaints, Grievances	Conformance	As part of the WKW Group, the Entity has appointed an external lawyer as an ombudsperson to combat statutory regulations violations

CRITERION	RATING	COMMENT
and Requests for Information		<p>and/or violations of internal compliance rules. The Ombudsperson's Office is available as a contact for 'whistleblowers' to provide confidential information on serious irregularities at the Entity and/or anyone providing information about unlawful conduct. This may include employees, customers or other third parties. The Ombudswoman's Office accepts all tips regarding suspected violations that are within the specified subject area.</p> <p>Information on the WKW Group's complaints resolution system is available at: <a href="https://www.wkw-group.com/nachhaltigkeit/compliance">https://www.wkw-group.com/nachhaltigkeit/compliance</a>  Information on the 'whistleblower' system and Ombudsperson and to submit a report directly. Refer to: <a href="https://www.compliance-aid.com/wkw">https://www.compliance-aid.com/wkw</a></p>

#### 4. MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment	Conformance	A Life Cycle Assessment (LCA) has been developed for one tonne of Aluminium. This includes various environmental indicators, including CO <sub>2</sub> , ODP and POCP.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Upon customer requests, all necessary information on the LCA and all product information may be provided. To date, the Entity has not received a customer request for LCA information.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as the overall design responsibility lies with the customer and cannot directly be influenced by the Entity. Nevertheless, the guideline of all business processes is to fulfil the WKW Group corporate goal of producing products with the lowest possible environmental impact.
4.3a-b Aluminium Process Scrap	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and there is 100 % separation at the Velbert sites and collection of internal Process Scrap. There is no separation of Aluminium alloys and grades for recycling at the Hemer site as it is not relevant to the outcome. This was demonstrated by a presentation of the recycling quantities.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity's products in general are recyclable and the NEWTRAL® product is completely recyclable. Within the production chain, the respectability of the material is of particular importance. Post-industrial Scrap is used in the production of billets. At the end of the life of the Aluminium strips, they can be recycled in the same method as end-of-life vehicles.</p> <p>Further information is available in the 2023 Sustainability Report: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is a member of automotiveland.nrw, GDA (Association of the Aluminium Industry) and VDA (Association of the Automotive Industry). The GDA working groups are active in furthering to improve the sustainability of Aluminium. It is planned that the Entity will participate more actively in the working groups.

#### 5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Greenhouse Gas (GHG) emissions are evaluated annually according to ISO 16064-3 and GHG Protocol, which are verified annually. The verification statement is available at: <a href="https://www.wkw-group.com/nachhaltigkeit">https://www.wkw-group.com/nachhaltigkeit</a></p> <p>Energy use and source data is disclosed in the 2023 Sustainability Report, pages 33-34: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.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 GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using an ASI endorsed methodology.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Major Non-Conformance	The Entity has established a GHG Emissions roadmap, including targets from 2021 to 2030 based on a 2021 baseline. This is reviewed externally annually. However, neither the GHG Emissions Reduction Plan nor the GHG Emissions Reduction Pathway are publicly disclosed.
5.4 GHG Emissions Management	Conformance	The Entity has implemented a management process according to CCF standards which is externally certified: <a href="https://www.wkw-group.com/sustainability">https://www.wkw-group.com/sustainability</a>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	An Emissions control officer has been appointed for Entity as required by German Law. The required measurements are undertaken in accordance with the available permits. Emissions to Air are published on the page of district government (Bezirksregierung), available at: <a href="https://app.thru.de/emissionen-kompakt">https://app.thru.de/emissionen-kompakt</a>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity is certified according to ISO 14001, and there is a process description in place for handling water-hazardous substances, including water discharges. The water statistics show the different sources and users, e.g. usage in the foundry and press shop, and sources from the city/municipal supply and well water.</p> <p>Water-related data is disclosed in the 2023 Sustainability Report, pages 35-36: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a> Water-related parameters are continuously monitored in accordance with Applicable Law.</p> <p>Whilst the Entity collects water consumption and discharge which are recorded annually, these data are not disclosed nor reported annually.</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has evaluated potential Leakages with an evaluation of environmental aspects, and significant cases have been defined.</p> <p>The Entity has implemented a system for dealing with Leakages, and a corresponding reporting system. The reports are recorded centrally in the Quentic System (EHSQ &amp; EHS Management Software System). A process plan for handling and eliminating leaks is in place. In addition, binding agents and extraction materials are available in all relevant areas.</p> <p>Incidents of Spills and Leakages are reviewed during management reviews, as well as within the Entity's relevant reporting chain.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented procedures to ensure that in the event of environmental damage, the relevant authorities are informed immediately. As part of emergency management, the Entity's crisis team informs the authority and, if necessary, the affected population. As necessary, the wider population is informed by the Entity's communications department. In the case of any Material Spills and Leakages occurring, further information will be reported in the management review or the Sustainability Report.</p> <p>To date, there have been no significant Material Spills or Leakage.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has established a waste management inventory of waste streams, and an 'up-to-date' annual waste report is published internally. The Entity follows a five-step hierarchy, which is published in the 2023 Sustainability Report, page 37: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p> <p>Compliance audits in respect to waste, annual internal reporting and the ISO 14001 Certificate is available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/ISO_14001/063753_-_Walter_Klein_GmbH_Co_KG_-_CERTIFICATE_-_deutsch_-_2023-07-11_-_UM15.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/ISO_14001/063753_-_Walter_Klein_GmbH_Co_KG_-_CERTIFICATE_-_deutsch_-_2023-07-11_-_UM15.pdf</a></p> <p>The Entity has not however publicly disclosed on an annual basis the quantity of Hazardous and Non-Hazardous Waste generated nor the associated Waste disposal methods.</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's Dross is stored safely on site. The Entity keeps Scrap statistics which are documented in the internal annual waste report. Dross is sent for external recycling by an external service provider. No Dross is sent to landfill.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity's water withdrawal information is categorised by source (e.g. ground water and mains water). The Entity undertakes a monthly evaluation of water withdrawal and maintains water statistics.</p>

CRITERION	RATING	COMMENT
		<p>Monitoring of water-related parameters is conducted according to Applicable Law. The Entity has implemented a process for handling hazardous water substances and discharges. This includes emergency procedures and who to inform.</p> <p>The German based sites of WKW Group are not located within any water protection or nature conservation areas. Water management is defined and coordinated in cooperation with the authority and is then undertaken within the framework of the corresponding water withdrawal permits. Water conservation concepts are processed within the organisation and implemented in accordance with the defined objectives.</p> <p>Information on water extraction and management is available in the 2023 Sustainability Report, page 36:  <a href="https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021.pdf">https://www.wkw.de/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2021.pdf</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the sites are not located within water protection or nature conservation areas. And the water-related risk has been assessed and documented as low.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The overall risk from the Entity's activities to Biodiversity is very low, as evidenced by the Environmental Impact Assessments and risk analysis. The existing properties are in long-standing industrial areas.</p> <p>In the case of new construction projects and approval procedures, the conditions are reviewed and evaluated in accordance with the project as part of the preliminary Environmental Impact Assessment (Umweltverträglichkeitsprüfung). Environmental impacts are evaluated as part of the Entity's risk assessment process.</p> <p>The Entity has implemented a procedural instruction for New Projects, which addresses Biodiversity and Ecosystem Services and includes the requirement for an EIA.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>This Criterion is not applicable to Entity as it was identified the inherent risk to Biodiversity as very low and the Entity's sites are located within industrial areas.</p> <p>In the case of new construction projects and approval procedures, the conditions are reviewed and evaluated in accordance with the project as part of the preliminary Environmental Impact Assessment.</p> <p>The Entity will reassess this requirement in future following a specific systematic review on Priority Ecosystem Services.</p>
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to Entity as it was identified the inherent risk to Biodiversity as very low. Nevertheless, management activities are ongoing, including support of Waldlokal ( <a href="http://www.waldlokal.com">www.waldlokal.com</a> ), a tree planting project where employees assist in the planting of trees.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity assessment did not identify any Priority Ecosystem Services. Currently, no changes to permits or construction projects are planned. The existing properties are in long-standing industrial areas.

CRITERION	RATING	COMMENT
		The Entity will reassess this requirement in future following a specific systematic review on Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has identified that only wooden pallets present a potential risk, however this risk is considered low as pallets are chemically treated.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity does not have any new construction projects planned, and existing sites are situated in long-standing industrial areas and as such are not located in nature reserves or water protection areas. No World Heritage Properties are affected or located at the production sites. A commitment is defined in the Supplier Code of Conduct under ‘Geopolitical neutrality’, available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_LF.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_LF.pdf</a>
8.6a-d Protected Areas	Conformance	The Entity does not have any new construction projects planned, and existing sites are situated in long-standing industrial areas and as such are not located in nature reserves or water protection areas. Impact Assessments must be completed before significant changes can be undertaken. The previous Impact Assessments were completed, for Velbert ( April 2020) and for Hemer (June 2016).
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	Minor Non-Conformance	<p>The Entity has considered Human Rights issues in its Management System. Different aspects are integrated into the Management Manual (e.g., Stakeholder analysis, targets, and Human Rights risks) including the identification of main suppliers, and their potential risks regarding Human Rights, including Forced Labour, Child Labour, and Discrimination. The review is undertaken at least annually. The Entity has implemented a Human Rights Policy and Supplier Code of Conduct.</p> <p>The new Human Rights Policy is not yet complete however and whilst the Due Diligence process has commenced, it is not to the extent required as per the UN Guiding Principles.</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Entity has developed several basic documents for the assessment of working conditions, including training materials where a gender perspective was considered and was formulated in a gender-neutral manner.</p> <p>Related disclosures including information on gender-related programs are available in the 2023 Sustainability Report, pages 53: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity’s Area of Influence. However, the rights of

CRITERION	RATING	COMMENT
		Indigenous Peoples are included in the Code of Conduct and Supplier Code of Conduct.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
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 there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is not undertaking any project activity that require either relocation or transfer of potentially affected persons.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has undertaken an analysis to identify aspects in the Stakeholder analyses (neighbourhood), in respect to noise (noise measurements have been made), etc., and complaints from neighbours (there were no complaints in recent years). There are no impacts on Stakeholders that have been identified in the last Certification period.</p> <p>The Entity's social commitments are detailed in the 2023 Sustainability Report: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has established a Management System to manage supply chain risks, including the implementation of a Code of Conduct (<a href="https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf">https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf</a>) with responsibilities defined and resources available.</p> <p>The Supplier Code of Conduct is an important aspect of the Entity's contracts with suppliers and addresses topics including Human Rights, Indigenous Peoples and Local Communities, 'geopolitical neutrality' and conflict minerals.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	All suppliers are listed on the Jagger system - a Due Diligence software to identify and assess risks. The Entity has also recently implemented a new risk management tool 'Scrio' that monitors suppliers in real time.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Supplier Code of Conduct is contractually integrated into supplier agreements and addresses key topics including Human Rights, Indigenous Peoples and Local Communities, 'geopolitical neutrality', and conflict minerals. This ensures clear and binding sustainability expectations across the Entity's supply chain.</p> <p>The Entity further applies a structured risk management approach. Relevant risks are defined within a dedicated risk tool, and corrective actions are partly implemented and monitored.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's Due Diligence practices are audited as part of the ASI Performance Standard Certification. The Entity is considering the London Metal Exchange (LME) Responsible Sourcing Rules for its supply chain.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>A Sustainability Report is published which covers different aspects in respect to Human Rights and risk in the supply chain, available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p> <p>The Entity covers different aspects in respect to Human Rights and risk in the supply chain.</p>
9.9 Security practice	Conformance	<p>The Code of Conduct for Contractors (<a href="https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_LF.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1-003_2.3.2_Code_of_Conduct_LF.pdf</a>) has been implemented and valid for the service provider company 'Kötter' in Velbert.</p> <p>The Code of Conduct for Suppliers and Business Partners are applied to Contractors. The Entity has engaged a service provider in Velbert to provide security services. The Team leader from external service provider has received training and subsequently provided training to its employees. Security personnel interviewed during the Audit are aware of the Code of Conduct.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to form or join Labour Unions or other associations to collectively bargain, which is well organised under German law. Worker representatives have been elected at the Entity. The Trade Union (IG Metall) is present at the Entity and has agreed on the Collective Bargaining Agreement.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable to the Entity, as it is located in Germany where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.</p>
10.2a Child Labour	Conformance	<p>The Entity does neither use nor support the use of Child Labour and there is Applicable Law against Child Labour in Germany.</p> <p>The youngest employees are 16 years and older who are only employed as part of an apprenticeship according to the <i>Youth Employment Protection Act</i> (Jugendarbeitsschutzgesetz) which is applicable for individuals from 16 to 17 years old.</p>

CRITERION	RATING	COMMENT
		There is a recruitment process with resumes reviewed, and for younger applicants, the parents are also involved. Personal identification documents are checked randomly.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking, either directly or through any employment or recruitment agencies. This was verified through a site tour, interviews, and document review.</p> <p>Whilst the Entity has established a Modern Slavery Statement, it was however not publicly disclosed at the time of the Audit.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has demonstrated it is aware of the German anti-Discrimination law (Allgemeine Gleichbehandlungsgesetz (AGG)). Equal opportunities are ensured, and the Entity does not engage in nor support Discrimination (e.g. in job postings).</p> <p>Remuneration is based on the official Collective Agreement on Remuneration (Entgelttarifvertrag (ERA)) level and job profiles for all positions available.</p> <p>The Entity has implemented a 'Young Professionals' program. The percentage of women in this program is the same as the percentage of women in the Entity, which gives evidence that women are supported in the same way as men. Discrimination is forbidden in all forms.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues. Frequent communication and an 'open-door' Policy between Workers, Worker representatives and management are evident.</p> <p>Information is provided throughout the Entity's facilities on blackboards, the Mitarbeiterinfo-Portal (employee portal) and on monitors with frequently changing information.</p>
10.6a-g Violence and Harassment	Conformance	<p>In consultation with Workers and their representatives, a workplace Policy on Violence and Harassment was established within the Code of Conduct, available at: <a href="https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf">https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf</a></p>
10.7a-c Remuneration	Conformance	<p>All wages are regulated through the Collective Agreement on Remuneration (Entgelttarifvertrag (ERA)) of the metal sector. There is no Remuneration differentiation between men and women . All staff are under the Collective Bargaining Agreement, which ensures that no pay is withheld and that all payments are made monthly. Payroll processing is managed by an external partner.</p>
10.8a-c Working Time	Conformance	<p>The Entity is aware of, and complies with Applicable Law, industry standards and Collective Bargaining agreement on Working Time (including Overtime working hours), public holidays and paid annual leave.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights in several different ways such as through blackboards or info portals in the intranet and directly via</p>

CRITERION	RATING	COMMENT
		the Workers' council and their meetings. Relevant laws are published in the employee intranet portal.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established a Health &amp; Safety Management System according to ISO 45001, which is part of the HSE Management System. An Occupational Health and Safety (OH&amp;S) Policy, available at: <a href="https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement">https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement</a></p> <p>Health and Safety Committee meetings take place frequently. An internal audit of environmental aspects is conducted which includes a consideration of safety.</p> <p>The Herne site does not hold ISO 45001 certification, however it has implemented and follows ISO 45001 practices. Inspections are conducted quarterly. First aid courses are offered on-site. Fire safety officers, first aiders and safety officers have been allocated. Unsafe conditions are reported via an internal reporting system, and appropriate measures are implemented as required. Data are compared with those of other companies and reported to the health insurance provider.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Management System (<a href="https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement">https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement</a>) is part of the integrated Management System and is reviewed at least once a year during the integrated management review or due to changes earlier. Health and Safety Committee meetings are regularly held, and internal audits reviews also occur.</p> <p>Related disclosures including information on OH&amp;S are available in the 2023 Sustainability Report, page 60: <a href="https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf">https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf</a></p> <p>Leading OH&amp;S indicators and comparative analyses of performance against peer businesses and leading practices however has not been publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>Health and Safety Committee meetings are held four times a year where Workers can raise, discuss, and participate in the resolution of Occupational Health and Safety (OH&amp;S) issues with management. The Worker's Council was elected and represents the Workers in Health and Safety issues. There are different means for the Workers to raise concerns including the ombudsperson, via the medical doctor, or directly via their managers.</p>

#### 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	7 February 2023	Initial Certification Audit – Full Certification
1	25 October 2024	Surveillance Audit
2	7 February 2026	Re-Certification Audit and Scope Change – Provisional Certification

---