ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Erbslöh Aluminium GmbH

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
255	PERFORMANCE STANDARD (V3.1 2023)	FULL CERTIFICATION	DQS CFS
DATE OF ISSUE	**DATE OF EXPIRY**	**CERTIFIED SINCE**	
8 OCTOBER 2026	7 OCTOBER 2029	7 FEBRUARY 2023	

AUTHORISED BY



Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at
www.aluminium-stewardship.org

CERTIFICATION SCOPE

Production and sale of Aluminium profiles for industrial applications and the automotive market at sites in Hemer and Velbert (Germany).

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Erbslöh Aluminium GmbH
ENTITY NAME	Erbslöh Aluminium GmbH
CERTIFICATION SCOPE	Production and sale of Aluminium profiles for industrial applications and the automotive market at sites in Hemer and Velbert (Germany).
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (14 -16 December 2022) • Surveillance Audit (29 - 30 July 2024) • Re-Certification Audit and Scope Change (16 – 17 December 2025) • Surveillance Audit (21 July 2026)
AUDIT FIRM	DQS CFS
AUDIT DATE	• 14 – 16 December 2022 (Initial Certification Audit) • 29 – 30 July 2024 (Surveillance Audit) • 16 – 17 December 2025 (Re-Certification Audit and Scope Change) • 21 July 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 10 January 2023 (Initial Certification Audit) • 16 August 2024 (Surveillance Audit) • 19 December 2025 (Re-Certification Audit and Scope Change) • 25 July 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (14 – 16 December 2022)</u> 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 dessin sheets in Velbert (two locations) and Hemer (one location), 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.

	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 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. Surveillance Audit (21 July 2026) The Audit Scope covers the development, sales, manufacturing, mechanical and surface finishing of Aluminium extruded profiles at Velbert 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.
AUDIT OUTCOME	• 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	8 October 2026 – 7 October 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	7 April 2028

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.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
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	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: https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf The Code of Conduct for Suppliers and Business Partners is available at: https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1.1-003_2.3.2_Code_of_Conduct_LF.pdf 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: https://www.compliance-aid.com/wkw
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented both a Code of Conduct and a Code of Conduct for Suppliers and Business Partners, which is incorporated into contracts. Code of Conduct: https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf Code of Conduct for Suppliers and Business Partners: https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1.1-003_2.3.2_Code_of_Conduct_LF.pdf Both documents are reviewed annually during the management review and when significant changes occur. No indication of a control gap has been observed.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented several Environmental, Social, and Governance related Policies, which are available at: Occupational Health and Safety Policy: https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagement Environmental Policy/Statement: https://www.wkw-group.com/nachhaltigkeit/umweltmanagement Energy Policy/Statement: https://www.wkw-group.com/nachhaltigkeit/energiemanagement

CRITERION	RATING	COMMENT
		Corporate Policy: https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.2-001_Unternehmenspolitik_FINAL_signed.pdf Human Rights Policy, available in the 2025 Sustainability Report, Chapter 6.9: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf The Policies are communicated internally via information boards, intranet, notices and emails. Training on these Policies is provided to all employees. 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 currently no indication of a control gap.
2.2a-c Leadership	Conformance	The responsibilities of the members of the Entity's Board of Management and the management 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. The Entity commits itself to conformance with ASI requirements within the Code of Conduct.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented Management Systems that are certified according to ISO 14001 and ISO 50001. The certificates are available at: https://www.wkw.de/downloads A risk analysis based on SA8000 has been undertaken.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has implemented an Integrated Management System that is divided into an ISO 45001 certified Occupational Health and Safety Management System and the Social Management System. The Social Management System was developed according to international and national regulations and the SA8000 standard, it is not yet certified. A risk analysis based on SA8000 has been undertaken.
2.4a-e Responsible Sourcing	Conformance	The Code of Conduct for Suppliers and Business Partners refer to responsible sourcing, available at: https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1.1-003_2.3.2_Code_of_Conduct_LF.pdf The Code is reviewed during the annual management review, or if significant changes occur. Risks are evaluated within the risk management process.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity, as there currently are no New Projects or Major Changes to the existing Facilities. Risk assessments are however undertaken as required, for example regarding hazardous substances or other environmental or social risks. The most recent environmental Impact Assessment was undertaken in Hema (2018 Baseline Report).
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable to the Entity, as there currently are no New Projects or Major Changes to the existing Facilities.

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan (ERP) as part of the ISO 45001 certified Integrated Management System: https://www.wkw-group.com/downloads 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. 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 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 the International Automotive Task Force (IATF) standards, which include social topics aligned with SA8000. It is reviewed during the annual management review or where 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 in future, 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.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publishes a Sustainability Report every second year, available at: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf Relevant data required by the ASI Performance Standard are integrated in the Sustainability Report.
3.2 Non-compliance and Liabilities	Conformance	All government reports, including inspection reports and notices of violations, are communicated to the affected areas when they occur within the Entity. This information is available in the Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
3.3a-c Payments to Governments	Conformance	All information related to Payments to Governments are disclosed in the Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf The Entity confirms there no payments made to governments or political parties as defined in the Sustainability Report.
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 and/or violations of internal compliance rules. The Ombudsperson's

CRITERION	RATING	COMMENT
and Requests for Information		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. Information on the WKW Group's Complaints Resolution Mechanism is available at: https://www.wkw-group.com/nachhaltigkeit/compliance Information on the 'whistleblower' system and Ombudsperson, and to submit a report directly, refer to: https://www.compliance-aid.com/wkw
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_2, Ozone Depleting Potential (ODP) and Photochemical Ozone Creation Potential (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	The Entity's Products are, in general, 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. Aluminium strips can be recycled at End of Life in the same method as End of Life Vehicles (ELV). Further information is available in the 2025 Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is a member of various industry associations including automotiveland.nrw, the German Aluminium Industry Association (GDA), VDA (Association of the Automotive Industry), and others, where current recycling and Circular Economy initiatives are discussed. 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 in future.
5. GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gas (GHG) emissions are evaluated annually according to ISO 16064-3 and the GHG Protocol, which are verified annually. The verification statement is available at: https://www.wkw-group.com/nachhaltigkeit Energy use and source data are disclosed in the 2025 Sustainability Report, pages 33-34: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
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 the ASI methodology.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway which includes annual targets. The Plan and Pathway are reviewed annually, including by an external party. The roadmap is available and communicated in the Sustainability Report, chapter 5.2: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
5.4 GHG Emissions Management	Conformance	The Entity has implemented a management process according to the Corporate Carbon Footprint (CCF) standards, which is externally certified: https://www.wkw-group.com/sustainability
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	An Emissions Control Officer has been appointed for the Entity as required by German Law. The monitoring of emissions is undertaken regularly and in accordance with relevant permits. Emissions to Air data are published via the District Government (Bezirksregierung), available at: https://app.thru.de/emissionen-kompakt
6.2a-g Discharges to Water	Conformance	The Entity is certified according to ISO 14001, and a process description is in place for managing water-hazardous substances, including water discharges. The Entity's water-related data statistics indicate the different sources and use, e.g. usage in the foundry and press shop, and sources from the city/municipal supply and well water. There is continuous monitoring of water-related parameters in accordance with Applicable Law. The Entity's Management System is certified to ISO 14001, and there is a process description for water discharges and the handling of hazardous substances. The Entity's water-related data are consolidated with other WKW Group sites and disclosed in the Sustainability Report, Chapter 5.3: https://www.wkw-

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		group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has evaluated potential Leakages during the assessment of environmental aspects, and significant cases have been defined. 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 & EHS Management Software System). A process plan for managing and eliminating leaks is in place. In addition, binding agents and extraction materials are available in all relevant areas. Incidents of Spills and Leakages are reviewed during management reviews, as well as within the Entity's relevant reporting chain.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	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. To date, there have been no significant Material Spills or Leakages.
6.5a-c Waste Management and Reporting	Conformance	The Entity has established a Waste inventory, and annual Hazardous and Non-Hazardous Waste data are disclosed in the Sustainability Report, Chapter 5.4: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf The Entity implements a five-step hierarchy for Waste management. Internal audits are undertaken as part of the Entity's ISO 14001 certified Management System. Specialist Waste management providers are also audited on a selective basis.
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	The Entity's Dross is stored safely and securely on site. The Entity maintains 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.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	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. Monitoring of water-related parameters is conducted according to Applicable Law. The Entity has implemented a process for managing hazardous substances and for discharges, which includes emergency procedures and communication requirements.

CRITERION	RATING	COMMENT
		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.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as its sites are not located within water protection or nature conservation areas, and the water-related risks have been assessed and documented as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The overall risk from the Entity's activities to Biodiversity has been assessed as very low, as evidenced by the Environmental Impact Assessments and risk analysis. The existing properties are in long-standing industrial areas. 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. The Entity has implemented a procedural instruction for New Projects, which addresses Biodiversity and Ecosystem Services and includes the requirement for an EIA.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	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. 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. The Entity will reassess this requirement in future following a specific systematic review on Priority Ecosystem Services.
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 (www.waldlokal.com), 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. 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.

CRITERION	RATING	COMMENT
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 nor located at the production sites. A commitment is defined in the Supplier Code of Conduct under 'Geopolitical neutrality', available at: https://www.wkw-group.com/fileadmin/content/downloads/Zertifikate_DE/Unternehmenspolitik/FB_5.1.1.1-003_2.3.2_Code_of_Conduct_LF.pdf
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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has considered Human Rights issues in its Management System. Various 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. Due Diligence assessments are undertaken in accordance with the UN Guiding Principles and the ILO and based on SA 8000. The Affected Populations and Organisations have been considered. Follow-up measures have been defined to reduce or prevent risks. The Entity provides a statement on Human Rights in the Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	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. There is a process description for the Gender Equity Programme (May 2026). There has been an investigation into which topics are relevant. Further information is available in the Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
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 Indigenous Peoples are included in the Code of Conduct and Supplier Code of Conduct.

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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 of 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 requires resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has undertaken an analysis to identify aspects in the Stakeholder analyses (neighbourhood), in respect to noise (noise measurements have been made), 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. The Entity's social commitments are detailed in the 2023 Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2023_interactive_komprimiert_neu.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Management System to manage supply chain risks, which includes the implementation of a Code of Conduct for Suppliers and Business Partners, definition of responsibilities and availability of resources and ongoing information gathering. The Entity accesses the 'Scrioo' platform to assist with the assessment of risks and the 'Jagger' system for supplier evaluation. The 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.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Management System to manage supply chain risks, which includes the implementation of a Code of Conduct for Suppliers and Business Partners, definition of responsibilities and availability of resources and ongoing information gathering. The Entity accesses the 'Scrioo' platform to assist with the assessment of risks and the 'Jagger' system for supplier evaluation.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Code of Conduct for Suppliers and Business Partners has been 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. 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.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices are audited as part of the ASI Performance Standard Certification. The Entity is considering the implementation of the London Metal Exchange (LME) Responsible Sourcing Rules for its supply chain.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	A Sustainability Report is published which addresses different aspects in respect to Human Rights and risk in the supply chain, available at: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
9.9 Security practice	Conformance	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 Entity's Code of Conduct.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	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. The Works Council has set aside several rooms for confidential discussions with employees. There is a Trade Union (IG Metall) present and there are regular consultations between the Trade Union and the Entity. Worker representatives have been elected at the Entity. The Trade Union (IG Metall) has agreed on the Collective Bargaining Agreement.
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 it is located in Germany where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour and complies with the Applicable Law against Child Labour in Germany. The youngest employees are 16 years and older who are employed as part of an apprenticeship according to the *Youth Employment Protection Act* (Jugendarbeitsschutzgesetz), which is applicable for individuals from 16 to 17 years. There is a recruitment process with resumes reviewed, and for younger applicants, the parents are also involved. Personal identification documents are checked randomly.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in nor supports the use of Forced Labour, including Human Trafficking, either directly or through any employment or recruitment agencies. As part of WKW Group, the Entity expects its suppliers to reject all forms of Child Labour and Forced Labour and to respect the rights of children and young people. The Entity has policies in place to ensure employees are exposed to dangerous, unsafe or harmful working conditions. There is however no formal Modern Slavery Statement developed by the Entity.
10.4a-c Non-Discrimination	Conformance	Equal opportunities are ensured at the Entity, and it does not engage in nor support Discrimination (e.g. in job postings). The Entity has implemented a policy that addresses recruitment, salaries and career development. Terminations and notice periods are governed by employment contracts. Remuneration is based on the official Collective Agreement on Remuneration (Entgeltrahmentarifvertrag (ERA)) and job profiles for all positions are available. 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. Discrimination is forbidden in all forms.
10.5 Communication and engagement	Conformance	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. Information sessions are held and contact persons have been appointed. Information is also provided via blackboards, the employee portal and on monitors.
10.6a-g Violence and Harassment	Conformance	In consultation with Workers and their representatives, a workplace Policy on Violence and Harassment was established within the Code of Conduct, available at: https://www.wkw-group.com/fileadmin/content/downloads/2024.05.02_Code_of_Conduct_2024_Final.pdf
10.7a-c Remuneration	Conformance	All wages are regulated through the Collective Agreement on Remuneration (Entgeltrahmentarifvertrag (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.
10.8a-c Working Time	Conformance	The Entity is aware of, and complies with Applicable Law, industry standards and the Collective Bargaining Agreement on Working Time (including Overtime working hours), public holidays and paid annual leave. Working hours are recorded using digital systems. Work rounds are also recorded via these systems. Overtime is paid appropriately.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights in several ways such as via blackboards, the employee portal on the intranet and directly via the Works Council and their meetings. Relevant laws are published in the employee intranet portal. A summary of relevant legislative changes is also made available quarterly, which is distributed to managers who in turn pass them on to Workers.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety Management System according to ISO 45001, which is part of the Integrated Management System. An Occupational Health and Safety (OH&S) Policy, available at: https://www.wkw-group.com/nachhaltigkeit/arbeitsschutzmanagemen Health and Safety Committee meetings take place frequently. An internal audit of environmental aspects is conducted which includes a consideration of safety. 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.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's OH&S Management System is part of its Integrated Management System that is reviewed at least annually during the integrated management review or following any changes. Health and Safety Committee meetings are regularly held, and internal audits reviews also occur. The Entity's OH&S related Key Performance Indicators (KPIs) are disclosed in the Sustainability Report: https://www.wkw-group.com/fileadmin/content/downloads/Nachhaltigkeit/Nachhaltigkeitsbericht_2025_interactive.pdf
11.2 Employee engagement on Health and Safety	Conformance	Health and Safety Committee meetings are held four times a year where Workers can raise, discuss, and participate in the resolution of OH&S issues with management. The Works 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.

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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 Scope Change to remove the Walzwerk site
3	8 October 2026	Surveillance Audit – Full Certification Correction to Rev 2, including revision of Certification and Audit Scope, to remove Walzwerk