

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# apt Holding GmbH

CERTIFICATE  
NUMBER

283

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

5 JUNE 2023

CERTIFICATION  
LEVEL

PROVISIONAL  
CERTIFICATION

DATE OF EXPIRY

4 JUNE 2024

ASI ACCREDITED  
AUDITING FIRM

TÜV RHEINLAND  
CERT GMBH

CERTIFIED SINCE

5 JUNE 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

apt Extrusions GmbH & Co. KG,  
Germany (remelter and casthouse  
for extrusion billets; 4 extrusion  
presses, anodising plant,  
mechanical machining)

apt Extrusions B.V. Netherland (2  
extrusion presses, anodising plant,  
mechanical machining)

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	apt Holding GmbH
ENTITY NAME	apt Holding GmbH
CERTIFICATION SCOPE	apt Extrusions GmbH & Co. KG, Germany (remelter and casthouse for extrusion billets; 4 extrusion presses, anodising plant, mechanical machining)  apt Extrusions B.V. Netherland (2 extrusion presses, anodising plant, mechanical machining)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none"><li>9 – 13 January 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>19 April 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers the Group's head office apt Holding GmbH, apt Extrusions GmbH &amp; Co. KG, Germany (remelter and casthouse for extrusion billets; 4 extrusion presses, anodising plant, mechanical machining) and apt Extrusions B.V. Netherland (2 extrusion presses, anodising plant, mechanical machining).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> <p>All applicable 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 5 June 2023 - 4 June 2024

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 5 December 2023

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CERTIFICATE NUMBER 283

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

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

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

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## ENTITY OVERVIEW

The apt Group started its business activities in 1972 in Langenfeld, North Rhine-Westphalia.

Today, the apt Group is an internationally active group of companies in the European aluminium industry. The apt Group processes aluminium at four locations in Germany, the Netherlands, and the Czech Republic. The value chain extends from the production of billets to extrusion and anodizing to the machined profile or ready-to-install product. The company produces technologically sophisticated extruded profiles and supplies them to internationally active companies in the construction, transportation, automotive and industrial sectors. The Group's headquarter is apt Holding GmbH in Monheim am Rhein.

In total, the apt Group has its remelting capacities, six extrusion presses, two anodizing lines, and a powder coating line to meet the needs of its customers and partners. Key figures for 2022 are:

- Production capacity of extrusion presses: 80,000 tons per year
- Surface finishing production capacity: 7.0 million m<sup>2</sup> per year
- Production capacity of mechanical processing: p.a. 15,000 tons per year
- Turnover: p.a. approx. 380 million €.
- Employees: approx. 1,000

## 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>	Low	Low	Low	Low
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Both sites have systems in place to maintain awareness of and to ensure Compliance with Applicable Law.</p> <p>The Entity has implemented and maintains an integrated Management System, which is certified against ISO 9001, ISO 14001 and ISO 50001 by an accredited certification body.</p> <p><a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. Its Code of Conduct, Supplier Code of Conduct and anti-Corruption guideline is publicly available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The apt Group established multiple anti-Corruption measures, such as Policies, training, Due Diligence checks and a whistleblowing line (<a href="mailto:ethics@apt-alu-products.com">ethics@apt-alu-products.com</a>), endorsed by senior management. Affected employees receive anti-Corruption training.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued and made publicly available its Code of Conduct: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The Code includes principles relevant to environmental, social and governance performance. The Entity runs a regular training programme for employees.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. They are made publicly available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a> or <a href="https://www.apt-alu-products.com/nl/downloads/certificaten-informatiebladen">https://www.apt-alu-products.com/nl/downloads/certificaten-informatiebladen</a></p> <p>The Entity has conducted training for its employees to make them aware of the Policies. The Policies are endorsed by senior management.</p>
2.2a-c Leadership	Conformance	<p>At each site, the Entity nominated a person at the senior management level who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and ensuring sufficient resources to support the implementation of the Standard.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>An integrated Management System is in place according to ISO 9001, ISO 14001 and ISO 50001: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>. The most recent audit report (August 2022) did not identify any non-conformances</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>As confirmed by document review and interviews with Workers and management, the Entity has implemented and maintains an effective social Management System including Human Rights, labour rights and Management System, which is based on the SA8000 standard.</p>

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has a system and practices for responsible sourcing in place. The Entity's Supplier Code of Conduct serves as a responsible sourcing Policy and does address environmental, social and governance issues. This Code is publicly available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The code will be regularly reviewed. The Entity is using the service provider EcoVadis (<a href="https://ecovadis.com">https://ecovadis.com</a>) to manage its suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is currently not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI.</p> <p>However, the Entity has established a documented procedure that covers the requirement of the ASI Performance Standard related to Environmental and Social Impact Assessments. The Entity holds a valid ISO 14001 certificate.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is currently not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI.</p> <p>However, the Entity has established a documented procedure that covers the requirement related to Human Rights Impact Assessments.</p>
2.7a-f Emergency Response Plan	Conformance	<p>As confirmed by document review and interviews, the Entity has site-specific Emergency Response Plans (ERPs) in place. The ERPs will be made available to authorities and auditors. And to external Stakeholders upon request, subject to management's approval.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has systematically identified and evaluated risks associated with its operations. Specific contingency measures associated with suspended operations have been defined for identified risks, as confirmed during the site visits.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed and implemented a procedure that conforms to the mergers and acquisitions requirements of the ASI Performance Standard. Mergers and acquisitions would be managed on the level of the holding, if such a case occurs.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>At the time of the ASI Audit, there were no closures, decommissioning or divestments planned.</p> <p>However, the Entity has developed and implemented a procedure that conforms to the closure, decommissioning and divestment requirements of the ASI Performance Standard. Closure, decommissioning and divestments would be managed on the level of the holding.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and its Material environmental, social and economic impacts in its 2021 Sustainability Report which is aligned to Global Reporting Initiative (GRI) guidelines, available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	The Entity provides information on non-compliances and liabilities in its annual Sustainability Report 2021, page 25: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>
3.3a-c Payments to Governments	Conformance	The Entity provides information on payments to political parties in its annual Sustainability Report 2021 (GRI 415: political influence), page 47: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Major Non-Conformance	A Grievance Mechanism has been implemented by the Entity. All grievances can be directed to this e-mail address <a href="mailto:ethics@apt-alu-products.com">ethics@apt-alu-products.com</a>  However, rightsholders and Stakeholders are not yet adequately informed about the Grievance Mechanism, as neither the e-mail address nor a description of the mechanism is made available on the Entity's website.
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major product lines and published the data in an Environmental Product Declaration (EPD), available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Environmental Product Declarations (EPD) are available at <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a> . These EPDs contain details of the boundaries, underlying assumptions and data sources.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, because the Entity's products are manufactured exclusively to customer design specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has developed a target of 100% of scrap for collection, recycling or reuse. It works continually and systematically to minimise the generation of scrap. Scrap from alloys 6060 and 6063 are collected and remelted together at the Monheim site. Sawdust and other alloys are separated into different containers and sent to recycling partners.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity only supplies other businesses and does not sell to consumers. Therefore, the promotion of recycling takes place by supporting the industry association "Aluminium Deutschland e.V.".
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has issued and publicly disclosed Material Greenhouse Gases (GHG) emissions and energy use on an annual basis in its

CRITERION	RATING	COMMENT
		<p>Sustainability Report 2021, pages 35 and 38: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The energy and GHG emissions data have been independently verified.</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	Conformance	<p>The Entity has issued its GHG Emissions Reduction Plans for both sites, consistent with a 1.5°C warming scenario. Its development was supported by Climate Partner, a specialised service provider (refer to: <a href="https://www.climatepartner.com/en">https://www.climatepartner.com/en</a>).</p> <p>The GHG Reduction Plan has been made publicly available at: <a href="https://www.apt-alu-products.com/wp-content/uploads/Klimastrategie-apt-Extrusions.pdf">https://www.apt-alu-products.com/wp-content/uploads/Klimastrategie-apt-Extrusions.pdf</a></p> <p>The GHG emissions and energy situation was reviewed by the Entity's management. This review will take place annually.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity works systematically to achieve performance aligned with the GHG emissions reduction plan and targets. It has implemented and maintains an energy Management System according to ISO 50001. See, <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has concluded that its emissions (other than CO<sub>2</sub>e) are not Material and therefore does not publish such data in their Sustainability Report. However, this Criterion is applicable to all Facilities, as Stakeholders have a legitimate interest in this data.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has made publicly available its consumption and Discharges to Water in its Sustainability Report 2021, page 36: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The Entity does not discharge directly into water.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity developed and implemented Policies, systems, procedures, and processes that conform to ASI Performance Standard's requirements related to the detection, assessment and management of Spills and Leakages. Controls were reviewed to prevent contamination of air, soil and water due to major Spills and Leakages. No major Spills or incidents were reported since the Entity joined ASI, see Sustainability Report 2021, page 37: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>Both production sites are subject to national law regarding systems for handling water-polluting substances. They are being checked</p>



CRITERION	RATING	COMMENT
		accordingly by the authorities and provisions have been made for Spills. The Entity holds a valid ISO 14001 certificate from an accredited certification body.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity is obliged to report any releases or leaks to the local authority immediately. The has published information about Spills and incidents publicly available in its Sustainability Report 2021, page 37: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>There were no Spills or leaks in the reporting year.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed a waste management plan and identified key waste streams generated during production (used chemicals, wood, filter cake). The Entity has implemented of Waste Mitigation Hierarchy (e.g., on-site recycling of Aluminium scrap). Waste is collected, according to local waste regulations and is categorised and labelled according to the European Waste Catalogue.</p> <p>The type and quantity of the disposed of waste are included in the Sustainability Report 2021, page 39: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	Dross is only generated at the Monheim site, where the Entity works to minimise the Aluminium content of the Dross and it stores Dross under a roof or in closed containers to prevent release and leachate to the environment. All Dross is sent to an external recycling facility.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water withdrawal, return and consumption have been made publicly available in the Sustainability Report 2021, (GRI-303-1), page 36: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>An assessment of water-related risks relating to the Watersheds in the Entity's Area of Influence did not identify any Material risks, especially as the consumed quantity is well below 1% of the total extracted quantity of the region.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water risk assessment did not identify any Material water-related risks.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's biodiversity risk assessments were conducted in 2021 for both sites with support from an external specialised expert. The assessments considered the site's operations and Area of Influence. Both sites of the Entity have integrated biodiversity aspects into their Management System.

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's biodiversity assessment did not identify Material impacts on Priority Ecosystem Services within the Entity's Area of Influence.
8.2a-g Biodiversity Management	Minor Non-Conformance	The Entity's biodiversity risk assessments were conducted in 2021 for both sites with support from an external specialised expert. A Biodiversity Action Plan has been established, addressing the recommendations made in the report.  However, at the time of the ASI Audit, this plan had not yet been made publicly available on the Entity's website.
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 that the Entity depends on Priority Ecosystem Services. Both sites of the Entity are situated in long established industrial zones.
8.4 Alien Species	Conformance	The biodiversity assessment conducted by specialised service provider Pulswerk, issued in December 2021, evaluated the risk of distribution of Alien Species due to the business activities of the Entity as low and the authors of the assessment did not recommend any action related to invasive species.  All biological material, present at the surface of the Aluminium is thermally destroyed during the extrusion process and eloxal process.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's sites are not located in or near World Heritage Properties, as confirmed by site visits and the UNESCO Map of World Heritage (refer to: <a href="https://whc.unesco.org/en/statesparties">https://whc.unesco.org/en/statesparties</a> ). The Entity has established a process in place to ensure that New Projects are not explored or developed in World Heritage Properties.
8.6a-d Protected Areas	Conformance	Both sites of the Entity are not located in Protected Areas, as confirmed by research. The nearest Protected Areas are approximately 100 kilometres from each site. Refer to the map of Protected Areas in North Rhine-Westphalia: <a href="http://p62.naturschutzinformationen.nrw.de/p62/de/karten/nrw">http://p62.naturschutzinformationen.nrw.de/p62/de/karten/nrw</a> and the map of nature reserves in The Netherlands: <a href="https://www.holland.com/be_nl/toerisme/activiteiten/natuurgebieden.htm">https://www.holland.com/be_nl/toerisme/activiteiten/natuurgebieden.htm</a>  Due to the size and nature of the business, there is no requirement to implement management plans to ensure the Entity's activities and Facilities do not adversely impact these Protected Areas.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The apt Group publicly subscribes to the United Nations Guiding Principles and has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights.

CRITERION	RATING	COMMENT
		<p>The Policy is available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The Entity has conducted a documented Human Rights Due Diligence (HRDD) with internal Stakeholders, the next step is to conduct systematic consultation of external Stakeholders. The sites are embedded in their respective community.</p> <p>The HRDD has confirmed that there are no salient adverse Human Rights impacts the Entity has caused or contributed to.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity demonstrated that it works to promote gender equity and women's empowerment at work.</p> <p>However, a defined program to promote gender equity and women's empowerment was not yet available at the time of the ASI Audit.</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as it is not engaged in Bauxite mining. Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity's Area of Influence are not directly affected by the Entity's operations.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (whose sites are located in central Europe), as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity's Area of Influence are not directly affected by the Entity's operations.</p>
9.6a-i Displacement	Not Applicable	<p>As confirmed by interviews and due to the size and nature of the business, this Criterion is not applicable to the Entity, as there have not been any New Projects or Major Changes which required the displacement of people since the Entity join ASI or ever before.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>Due to the size and nature of the Entity's business, there were no salient issues related to the rights and interests of affected populations and organisations in the vicinity of the production sites.</p>

CRITERION	RATING	COMMENT
		As no significant risks have been identified, there was no need for an action plan related to populations and communities. However, the Entity is supporting the communities, where they are operating via several initiatives. Refer to the Sustainability Report 2021, page 15: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity has issued and made publicly available its Supplier Code of Conduct, available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>Processes are in place at the Group level and local level for reviewing Due Diligence. The Entity works to source Primary Aluminium material from ASI Certified suppliers.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity does not source from Conflict-Affected or High-Risk Areas. 100% of its Aluminium suppliers hold an ASI Performance Standard Certificate and, at the time of the ASI Audit, 80% hold an ASI Chain of Custody Certificate.</p> <p>However, the Entity has set up a process to assess and evaluate their suppliers and the associated risk levels. A process for supplier assessment and evaluation has been set up and is ongoing. The Entity requests EcoVadis assessments from its Aluminium suppliers.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity does not source from Conflict-Affected or High-Risk Areas. 100% of its Aluminium suppliers hold an ASI Performance Standard Certificate and, at the time of the ASI Audit, 80% hold an ASI Chain of Custody Certificate.</p> <p>However, the Entity has set up a process to respond to identified supply chain-related risks, should they be identified. No Material risks identified so far, as all suppliers of Aluminium hold ASI Certifications.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity does not source from Conflict-Affected or High-Risk Areas. 100% of its Aluminium suppliers hold an ASI Performance Standard Certificate and, at the time of the ASI Audit, 80% hold an ASI Chain of Custody Certificate.</p> <p>However, the Entity is setting up a process for regular audits of the supply chain Due Diligence practices. The Entity's Due Diligence practices have been audited as part of this ASI Performance Standard initial Certification Audit.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity does not source from Conflict-Affected or High-Risk Areas. 100% of its Aluminium suppliers hold an ASI Performance Standard Certificate and, at the time of the ASI Audit, 80% hold an ASI Chain of Custody Certificate.</p> <p>The Entity has publicly reported on its supply chain Due Diligence on their website, available at: <a href="https://www.apt-alu-products.com/nachhaltigkeit/umweltmanagement">https://www.apt-alu-products.com/nachhaltigkeit/umweltmanagement</a></p>

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity employs only unarmed guards. Document review and Workers interviews confirmed that the private security provider respects Human Rights in line with recognised standards and good practices.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Interviews with Workers and their representatives confirmed that the Entity respects the rights of Workers to unite freely, seek representation and join the works councils without interference. Both sites have a freely elected Worker representation and abide by collective agreements bargained with the unions.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the Entity does not operate in countries where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected. The youngest Worker (apprentice) was 17 years old at the time of the ASI Audit, as confirmed by interviews and the employee roster.
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, as confirmed by interviews with Workers and management as well as a document review.</p> <p>In their Code of Conduct, the Entity stated that they do not tolerate any form of Human Trafficking or Child Labour and are fundamentally opposed to any type of forced or compulsory labour. However, the Entity has not yet published an annual Modern Slavery Statement detailing their actions to address modern slavery.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Group Code of Conduct: <a href="https://www.gpt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.gpt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>The Code has been made available to Workers, and they have been trained in the values stated in the Code of Conduct. As confirmed by interviews and document review, the Entity does not engage in or support Discrimination for the grounds mentioned in this criterion.</p> <p>The Entity underwent an SA8000 social audit to check compliance with social requirements. The Entity continues to work to eliminate the historical disadvantage of women.</p>
10.5 Communication and engagement	Conformance	<p>Workers, Worker representatives and management confirmed that the company communicates appropriately and co-operates in good faith with Workers and their representatives on work-related issues. Works council members and management meet regularly.</p> <p>Employee interviews demonstrated that Workers feel valued by their management.</p>

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity is committed to implementing a respectful working environment and has prohibited any form of harassment or pressure in the workplace, nor do they tolerate Discrimination or corporal punishment (see Code of Conduct, page 4). The Code has been communicated and Workers received related training. The Code will be regularly reviewed.</p> <p>As confirmed by interviews and document review, the Entity does neither engage in, nor tolerate the use of inadequate and unacceptable treatment of Workers.</p>
10.7a-c Remuneration	Conformance	<p>The wages provided by the Entity meet the industry standard and are well above the legal minimum. Supporting evidence, such as work contracts, pay slips and Collective Bargaining agreements were available. This was confirmed through interviews with employees.</p>
10.8a-c Working Time	Conformance	<p>Interviews and document review confirmed that the Entity complies with relevant law and collective agreements on Working Time, public holidays and annual leave. The provisions in place ensure that Workers have off-time and length of workdays compliant with Applicable Law, industry standards and the requirements of this Criterion.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>Interviews with Workers and management confirmed that Workers are informed about their rights. In every employment contract, there is a reference to the most relevant legal codes as well as the collective agreement provisions. Every employee has the opportunity to obtain necessary information via the company intranet section 'Employee information'.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an active Occupational Health &amp; Safety (OH&amp;S) Management System, as confirmed by site tours, interviews and document reviews. Audits and management reviews have been demonstrated.</p> <p>The Entity has issued and communicated its Policy related to OH&amp;S. The policy is publicly available at: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented a process to review its Management System for OH&amp;S. The Entity conducts internal audits, and the first management review took place. The effectiveness of the OH&amp;S Management System has been made publicly available in the Sustainability Report 2021, pages 42-43: <a href="https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter">https://www.apt-alu-products.com/downloads/zertifikate-datenblaetter</a></p> <p>However, the publication of performance indicators is limited to lagging indicators. The Sustainability Report does not include leading OH&amp;S performance indicators.</p>
11.2 Employee engagement on Health and Safety	Major Non-Conformance	<p>The OH&amp;S Management System implemented by the Entity is not fully effective, as a joint health &amp; safety committee, which is an essential system element (see ILO Convention 155), is not implemented at the Roermond site.</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	5 June 2023	Initial Certification Audit – Full Certification

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