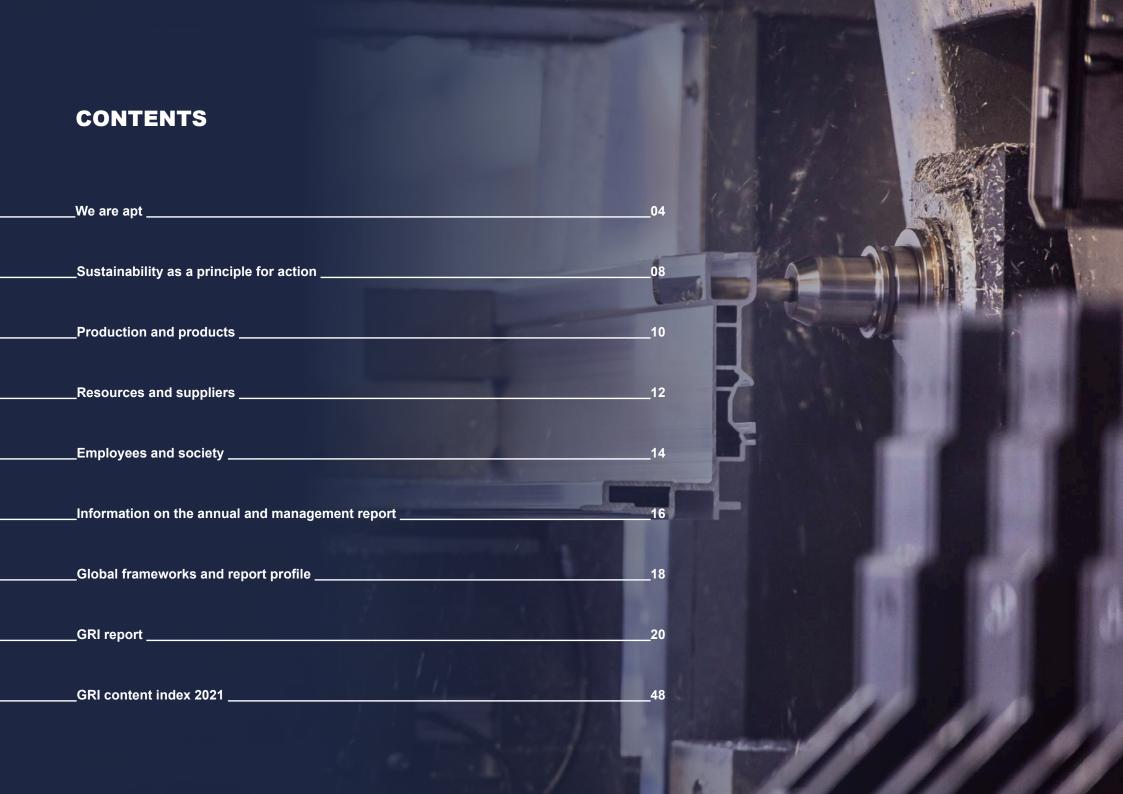




# SUSTAINABILITY REPORT

2021

apt Group







We take responsibility for our actions
– not only towards our employees, business partners, authorities and neighbours, but also towards our environment.
We are guided by clear values and principles, which include defined processes and a continuous improvement system.







### **Foreword**



Dear Readers.

On the evening of 12 December 2015, the UN Climate Change Conference in Paris resolved an agreement that aims to limit global warning to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. This formed the basis for the European Green Deal, which was approved by the European Commission on 11 December 2019 and is geared towards helping the European Union to become the first continent to be a net-zero emitter of greenhouse gases by 2050.

That is why the issue of sustainability is rightly of such importance today. It is something that we deal with every single day of our lives, both at work and at home.

Unfortunately, due to a wide range of factors in the recent past, we are falling short of our targets and must all redouble our efforts to achieve the goals that are so vital for generations to come.

It is our responsibility to act sustainable towards economy, ecology and society. Our future will be determined by our actions.

This is the inaugural edition of our Sustainability Report, in which we begin to document our journey towards becoming a net-zero company. We are guided by the United Nations' 2030 Agenda for Sustainable Development, which is



centred on the 17 Sustainable Development Goals (17 Goals – United Nations – Regional Information Centre for Western Europe (unric.org)) focusing on social, environmental and economic issues. By basing our sustainability strategy on the goals and time scales of the 2030 Agenda for Sustainable Development, we are reaffirming our commitment to ensuring that our business not only meets legal requirements, but also has a positive impact on society and achieving Europe's goals.

On joining the Aluminium Stewardship Initiative in October 2021, we pledged to certify our apt Extrusions locations according to ASI criteria by early 2023. We continue to dedicate resources to expanding our sustainable management strategy. Every single one of our projects is reviewed from a sustainability standpoint and approved if sustainability goals are included. For the purposes of transparency, we have also had the carbon footprint (Scope 1 to Scope 3 emissions) of our aforementioned locations certified and found that we are significantly below the industry average.

The next major milestone on our journey is to lower the emissions of our primary materials, which make up approximately 91% of our carbon footprint, to  $4t CO_2/t$  aluminium or less.

Transitioning our energy supply to renewable sources will also make a major

contribution to our sustainability efforts. We will also continue to press ahead with adding photovoltaic capacity to our locations.

Our actions as a company are based on the United Nations Global Compact and the principles it sets out regarding human rights, labour standards, environmental action and the fight against corruption.

Finally, let us all be optimistic and confident that technological advancement will provide answers to many of the questions we still face.

I hope you enjoy reading our sustainability report.

Yours,

#### **Michael Zint**

Chief Executive Officer apt Group

## **Facts and figures**

269<sub>8</sub> million euros

in revenues generated by the Group in 2021

1,575.\*

of CO<sub>2</sub> emissions are generated per day

\* apt Extrusions plants only



approx. 1,000

employees are the key to our success



2,187<sub>m³</sub>

of water is consumed per day

80,000 t

of production capacity for extruded aluminium profiles

**15,000** to

of production capacity for mechanical processing



192.6 MWh

of electricity is consumed per day

**144** audits

were carried out in 2021



18,000

of aluminium process scrap is recycled in our foundry every vear







## Aluminium competence for over 50 years

### A leader in the European aluminium industry

#### From raw material to end product

The apt Group is one of the leading companies in the European aluminium industry. At our apt Extrusions and apt Products plants, we develop and manufacture technologically advanced aluminium profiles and mechanically processed products from aluminium and market them to renowned customers in the construction, transport, automotive and industrial sectors. Our manufacturing processes cover the entire value-added chain: from raw material to end product. With our in-house remelting capacities, extrusion lines, state-of-the-art fabrication, anodising plants and powder-coating systems, apt delivers a broad range of expertise – true to our motto "Essential parts. Essential partners."

#### **Automated production**

We are just as capable of manufacturing serial products as we are at producing single units in one-piece flows. Our cutting-edge, high-performance production systems are fully automated and offer complete flexibility. Through our production operations, we offer a wide variety of products ranging from extruded aluminium profiles and components to turnkey systems and solutions.



## apt today

### A strong group



#### apt Holding GmbH

Monheim (DE)

Strategic management of the apt Group and dedicated support through centralised functions

#### apt Extrusions GmbH & Co. KG



#### Monheim (DE)

- **Extrusion**
- Anodising
- Remelting
- » Mechanical processing

Focus: construction, transport, industry

#### apt Extrusions B.V.



#### Roermond (NL)

- **Extrusion**
- Anodising
- Mechanical processing

Focus: construction, automotive, industry

### apt Products GmbH



#### Eckental (DE)

- Profile and sheet metal processing
- Fabrication
- Powder-coating
- Centre of excellence: bus flaps and door frames

Focus: transport, industry

#### apt Products s.r.o.



#### Cheb (CZ)

- Profile and sheet metal processing
- Fabrication
- Centre of excellence: heat sinks, guide rails, engine housings

Focus: automotive, industry



The Group's head office is located at apt Holding GmbH in Monheim am Rhein, which manages and plans the strategies of apt Group subsidiaries. By offering centralised finance, IT, business development and HR functions, we can provide Group companies with specialist support and guidance when implementing pre-defined strategies and focus on the further development of the apt Group.

At our of apt Extrusions plants measuring a total of 65,500m², we manufacture mill-finished and surface-finished aluminium profiles. Both plants also have anodising plants on site – the plant at the Monheim location is one of the largest in Europe.

At both apt Products plants, which measure almost 19,000m² in total, we process extruded aluminium profiles and sheet metal into sophisticated and complex products. In-house engineering teams craft solutions for customers and remain on hand to support them throughout the entire process – from coengineering to industrial in-house product manufacturing.

100%

100%

apt Extrusions B.V.

Roermond. Netherlands

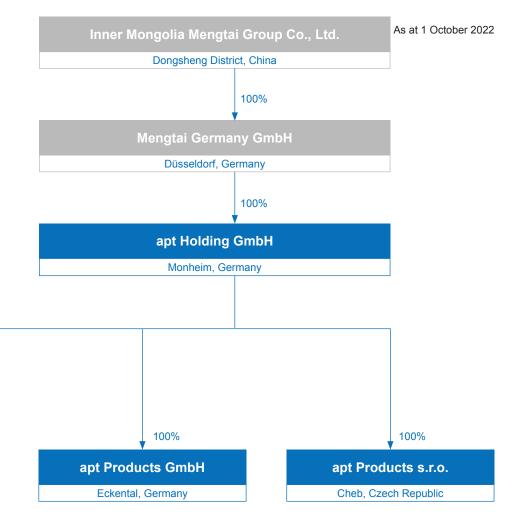
100%

apt Extrusions Management GmbH

Monheim, Germany
0%

apt Extrusions GmbH & Co. KG

Monheim, Germany



## Sustainability as a principle for action

### Aluminium is green

Our vision is to transform aluminium production in line with society's expectations for sustainable development. We have three areas of focus: production and products, resources and suppliers, and employees and society.

Our products must meet high standards when it comes to quality and environmental friendliness. This quality pledge also includes continuously improving our production processes.  $\rightarrow$  See p. 10

At the apt Group, it's all about people. We support our employees, as we know they are the key to our success. Social responsibility is a firm part of our corporate values.  $\rightarrow$  See p. 14

PRODUCTION AND PRODUCTS

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In our view, sustainability starts with the procurement of the valuable raw material that is aluminium. We select our global suppliers according to strict criteria.  $\rightarrow$  See p. 12



Our mission is to be a one-stop shop for all of our customers' aluminium needs, while maintaining outstanding quality, security of supply and flexibility. The two apt Extrusions plants are responsible for remelting, extrusion and surface-finishing processes as well as simple mechanical processing. Co-engineering and fabrication – including remodelling/shaping, sawing and cutting, CNC turning and milling, punching and nibbling, embossing and deep drawing, welding, joining and bonding – are mainly handled by apt Products plants.

#### ► Markets: automotive, construction, industry, transport

Essential parts. Essential partners. That is the DNA of our strategy. We focus on the automotive, construction, industry and transport markets, and on delivering technologically advanced products and solutions.

#### ► Ready for the future with new technologies

Our partnerships and collaborations at all levels of the customer-supplier relationship are the foundations of our success. We will continue to build on them moving forward and ensure that our customer and product portfolio is fit for the future as more processing methods and innovative technologies emerge.



### **Production and products**

The apt Group supplies customers all over the world with innovative, high-quality aluminium products and complex solutions. Our aluminium products and solutions are used in the construction, transport, automotive and industrial sectors.

#### **Extrusion**

We manufacture extruded aluminium profiles tailored precisely to customer requirements using innovative, fully automated process technology. Our extrusion lines have the capacity to produce 80,000 tonnes of extruded aluminium per year. Our services range from initial project consulting and co-engineering to prototyping and efficient series production.

#### **Processing**

We process extruded aluminium profiles and sheet metal, offering our customers an end-to-end service spanning everything from product development and processing to finishing and assembly. Thanks to our intelligent manufacturing concepts, we can handle small series and large-scale production, as well as single units and prototypes, with ease. Precisely coordinated process flows and ground-breaking technologies enable us to achieve maximum production efficiency.

#### **Certified quality management**

"Quality is when everything clicks. From start to finish."

Quality has many facets: perfect products, clearly defined processes, timely delivery, comprehensive customer service, efficient production, strict controlling and state-of-the-art communications. We are continuously optimising our organisational structure and production to ensure that we can deliver this quality at all times. Our production companies are also regularly certified according to international standards.

▶ ISO 9001 : 2015 A quality management system meeting the

requirements of ISO 9001 was implemented and

certified at all locations.

▶ ISO 14001 : 2015 All plants received environmental standard ISO 14001

certification.

▶ ISO 50001 : 2018 An energy management system according to ISO

50001 was introduced at both apt Extrusions plants and at apt Products GmbH and applies to aluminium extrusion, anodising and supplying aluminium profiles.





#### Goals for 2030

We are currently in the process of developing a transformation strategy, which will determine our goals and our management approach in products and production.

#### **Measures and implementation**

Specific measures to achieve our goals will be defined/determined in the course of the development of our transformation strategy.

Measures that have already been introduced include the following:

- » Calculation of our carbon footprint as a basis for our decarbonisation strategy at both apt Extrusions plants
- » Optimisation of process management

The following measures are currently being introduced:

- » Development and implementation of a materiality process
- » Development of a decarbonisation strategy
- » Development of the Aluminium 2030 model factory
- » Optimisation of the circularity concept

Existing measures will be updated when necessary during the relevant process.

### **Resources and suppliers**

In our view, sustainability starts with the procurement of the valuable raw material that is aluminium, which is why we believe that resources and suppliers are so vital to our sustainable development.

#### Sustainability criteria for suppliers of raw materials

- » Production of primary aluminium using hydropower and geothermal energy with the aim of further reducing CO₂ emissions in the manufacturing process and in our products
- » Recycling secondary aluminium to produce billets at facilities near to our production sites with the aim of lowering energy consumption and minimising transport distances
- » Security of supply
- » Research and development expertise in processing raw materials for special applications
- » Certifications, including ISO 9001, ISO 14001, ISO 14025, ISO 14064, ISO 50001, IATF 16949
- » Membership of organisations, including ASI, AUF, Metalle pro Klima, Cradle to Cradle

#### Sustainable resource management

We ensure that resources are used sustainably both inside and outside of the company through our proactive system of environmental, energy and quality management. Proactive management is a part of our continuous improvement process.

#### **► EXTERNAL**

We are active members of selected organisations and associations, where we contribute our wealth of experience and expertise to help shape a sustainable future. For example, we work on common solutions as part of Aluminium Deutschland e. V. and Verband für die Oberflächenveredelung von Aluminium e. V (German association for the surface treatment of aluminium). This includes playing an active role in the recycling working group of Aluminium Deutschland.

#### **► INTERNAL**

Our quality pledge includes continuously improving our production processes. We keep a particularly close eye on environmental aspects and using resources sparingly. Multiple project teams monitor the latest energy and environmental solutions on a daily basis.







#### Goals for 2030

The next major milestone on our journey is to lower the emissions of our primary materials, which make up approximately 91% of our carbon footprint, to 4 t CO<sub>2</sub>/t aluminium or less.

Further goals will be defined for the following areas once the transformation strategy has been finalised:

- » Supply chain transparency
- » Resource efficiency

#### **Measures and implementation**

#### **▶** RESOURCES

Aluminium is one of the most sustainable metals on the planet. It can be recycled time and again without any loss of quality using a process that only requires around 5% of the energy needed to manufacture primary aluminium. By turning process scrap into aluminium billets at our in-house foundry and feeding these secondary materials back into the manufacturing process, we can reuse up to 18,000 tonnes of aluminium every year.

Other measures in the area of resources:

- » Use of low-carbon aluminium
- » Use of aluminium from external recycling facilities, provided that strict European quality, environmental and social standards are met

#### **▶** SUPPLIERS

All new suppliers of core materials required for our manufacturing operations were assessed according to quality and environmental criteria in 2021.

We plan to introduce an assessment system for all suppliers through Ecovadis – initially at apt Extrusions GmbH & Co. KG and then across the entire apt Group.

## **Employees and society**

Employees and society is all about people. Our value-centric corporate culture fosters an atmosphere of mutual respect among our colleagues, customers and suppliers.

#### **Embracing our values**

Our values have been the cornerstone of our corporate culture for more than 50 years and are lived by our employees every day. They are a foundation of our success and are a guidance for our development as a business.

#### Trust, partnership, passion

Passion, dedication and expertise are what drive us. We love taking on new tasks and challenges. We are supportive, respectful and loyal to one another. Our dealings with customers and suppliers, as well as with colleagues at apt, are founded on trust and partnership. We have built long-standing relationships that we nurture and grow. Together we want to shape the future.

#### **Never stop learning**

We focus on getting results and take pleasure in lifelong learning. Teamwork and systematic training, including at our own apt Academy, provide us with the expertise, flexibility and confidence in our decision-making that we need to be competitive on a daily basis.

#### Committed, diverse, open-minded

Our dedicated and highly motivated workforce is our most valuable resource. apt Group employees consider themselves to be one team made up of many different personalities. Diversity is championed at apt, both during the working day and in after-hours leisure activities – across nationalities, locations and cultures.





#### Goals for 2030

- » Increase diversity
- » Foster a common understanding of sustainability
- » Develop employees' sustainability competencies

#### **Measures and implementation**

#### **►** EMPLOYEES

We apply our employee qualification process to all of our locations and also offer an attractive range of benefits. Our team wants to keep learning – and we give them the opportunities to do so, through training positions, personal development plans, special programmes to foster new talent, language courses and internal training courses. Training is allocated a specific annual budget. Supervisors can use their annual HR development planning process to indicate where there is a need for training, which can then be acted on.

We plan to launch a new communications campaign geared towards attracting more women to our team.

#### **▶** SOCIETY

We support regional organisations and projects such as the Lions Club in Monheim, the "Ein Kinderlachen schenken" initiative at the children's charity Kinderhilfe Eckental, the KiKa children's cancer charity organisation in Amstelveen in the Netherlands and St George's hospice in Cheb, Czech Republic. At events such as the Long Night of Industry, our apt Extrusions plant in Germany opens its doors to give visitors a glimpse behind the scenes.

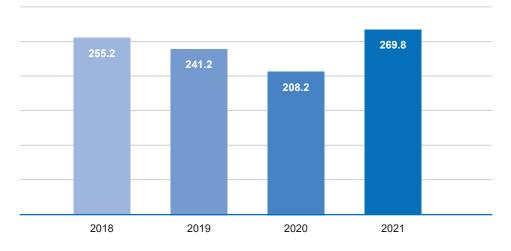
## Information on the annual and management report

### Highlights of 2021

#### apt Group

The apt Group successfully increased its consolidated revenues in 2021 following three years of declining figures in 2018, 2019 and 2020. This enables us to begin our 50th anniversary year with renewed vigour.

#### Consolidated revenues of the apt Group (in millions of euros)



#### **Extrusion**

The two apt Extrusions plants – apt Extrusions GmbH & Co. KG in Germany and apt Extrusions B.V. in the Netherlands – account for the majority of the apt Group's revenues.

Sales in financial year 2021 were significantly higher than originally forecast. Extruded aluminium product sales rose year on year, and the anodising business also grew in 2021, both of which had a positive impact on revenues.

#### **Products**

Both apt Products plants – apt Products GmbH in Germany and apt Products s.r.o. in the Czech Republic – also reported a slight increase in revenues in 2021 compared to the previous year.

The successful restructuring of apt Products GmbH in Eckental is also reflected in this result.





#### Restructuring of apt Products GmbH successfully completed

apt Products GmbH in Eckental has been successfully restructured thanks to an insolvency plan, laying the foundation for its future direction. The restructuring saved more than 50% of jobs at the site. The company had filed for insolvency with self-administration at the district court of Düsseldorf in December 2020. Insolvency proceedings were ceased effective as at 30 June 2021.

apt Products GmbH specialises in manufacturing complex aluminium components and parts at the Eckental site. Its products are used in commercial vehicles such as buses and trucks. In 2020, orders at apt Products GmbH from major coach manufacturers were reduced as the global tourism sector collapsed and the company fell victim to the effects of the Covid-19 pandemic shortly afterwards. apt filed for insolvency with self-administration for the Eckental location and put together a recovery plan together with restructuring experts, the shareholder and the management team. Supplier relationships were able to be maintained, and apt Products GmbH's key accounts in the commercial vehicle sector lent their support by concluding robust agreements. These factors were key to ensuring the success of the restructuring and saving 56 of the 106 jobs at the plant, and laid the foundations for apt Products GmbH's future direction.

### **Global frameworks**

#### SDGs and the EU Green Deal

Political frameworks form the basis for our sustainable development. We are guided by the United Nations' 17 global Sustainable Development Goals (SDGs), which aim to achieve a sustainable future for everyone through economic, social and environmental action.

We also act in line with the objectives of the EU Green Deal, which is geared towards cutting net greenhouse gas emissions, decoupling economic growth from resource use through the circular economy and upholding social standards in the supply chain.

#### **CORE GOALS**



Promote decent work and sustainable growth



Build resilient infrastructure and promote inclusive and sustainable industrialisation



Ensure sustainable consumption and production patterns



Take urgent action to combat climate change and its impacts

#### **OTHER GOALS**





























#### Report profile

### **About this report**

This apt Group Sustainability Report is the first one by the company and is therefore considered the starting point of the apt Group's sustainability reporting. It was prepared in accordance with GRI standards for the period from 1 January 2021 to 31 December 2021. As a result, 2021 is the benchmark year for future sustainability reporting.

GRI 1: Foundation 2021, GRI 2: General disclosures 2021 and GRI 3: Material topics 2021 were used in the preparation of this report. The report refers to the activities of the two apt Extrusions plants (apt Extrusions GmbH & Co. KG in Germany and apt Extrusions B.V. in the Netherlands) and the two apt Products plants (apt Products GmbH in Germany and apt Products s.r.o. in the Czech Republic).



### **GRI 2: General disclosures**

#### **GRI 2 - 1**

#### **Organisational details**

#### apt Holding GmbH

Rheinpromenade 11 40789 Monheim am Rhein Germany

apt Holding operates in three countries: Germany, the Netherlands and the Czech Republic.

#### **GRI 2 – 2**

#### Entities included in the organisation's sustainability reporting

#### apt Extrusions GmbH & Co. KG

Daimlerstraße 10 40789 Monheim am Rhein Germany

#### apt Extrusions B.V.

Industrieweg 8 6045 JG Roermond The Netherlands

#### apt Products GmbH

Orchideenstraße 2 90542 Eckental Germany

#### apt Products s.r.o.

Průmyslový park 33/22 35002 Cheb – Dolní Dvory Czech Republic

#### GRI 2 - 3

#### Reporting period, frequency and contact point

#### Reporting period:

2020-2021 – The reporting period for this inaugural report is one year. Subsequent sustainability reports will be published annually.

#### Publication date:

6 January 2023

#### Contact for questions relating to the Sustainability Report:

Felix Watermeyer

#### Reporting period for financial reporting:

1 January 2021 - 31 December 2021

#### **GRI 2 – 4**

#### **Restatements of information**

The organisation did not make any restatements in the reporting period.

#### GRI 2 – 5

#### **External assurance**

This report has not been subject to any external assurance. The highest governance body, CEO Michael Zint, and the apt Sustainability Committee are responsible for reviewing the report.



### **GRI 2 – 6**

#### Activities, value chain and other business relationships

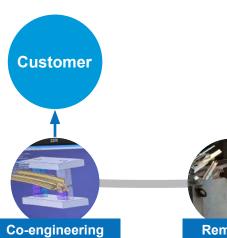
apt Holding GmbH operates in the aluminium sector, serving the following markets, among others, together with its subsidiaries:

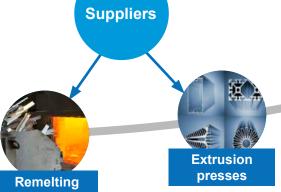
CONSTRUCTION	TRANSPORT	AUTOMOTIVE	INDUSTRY
Extruded aluminium profiles and construction components for the following areas:  » Construction » Sun protection systems » External cladding and roofing » Interior fittings » Agricultural systems » Infrastructure and street equipment etc.	<ul> <li>Door frames and flaps for buses</li> <li>Trailer solutions, such as front bulkhead profiles, roof spars, board wall profiles, socket scuff rails, underrun guard profiles</li> </ul>	<ul> <li>» Guide rails for car roof systems</li> <li>» Convertible roof components</li> <li>» Car accessories</li> </ul>	Extruded aluminium profiles and construction components for the following areas:  » Mechanical and systems engineering » Electronic technology » Medical equipment

Production figures p.a.			
	2020	2021	
Extrusion			
apt Extrusions GmbH & Co. KG (DE)	36,996 t	42,634 t	
apt Extrusions B.V. (NL)	24,841 t	27,647 t	
Sheet metal and profile processing			
apt Products GmbH (DE)	_	1,100 t	
apt Products s.r.o. (CZ)	1,358 t	1,613 t	
Total	63,195 t	72,994 t	
Anodising			
apt Extrusions GmbH & Co. KG (DE)	2,874,494 m <sup>2</sup>	3,347,164 m <sup>2</sup>	
apt Extrusions B.V. (NL)	1,707,600 m <sup>2</sup>	2,095,660 m <sup>2</sup>	
apt Products GmbH (DE)	_	300,000 m <sup>2</sup>	
Powder coating			
apt Products GmbH (DE)	-	15,000 m <sup>2</sup>	
Total	4,582,094 m²	5,757,824 m²	

	2020	
	2020	2021
apt Extrusions GmbH & Co. KG (DE)	378	373
apt Extrusions B.V. (NL)	228	209
apt Products GmbH (DE)	36	31
apt Products s.r.o. (CZ)	28	30
Total	670	643













#### GRI 2 – 7

#### **Employees**

	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
Female employees	28	3	9	81
Male employees	269	105	46	155
Trainees	7	0	0	3
Part-time employees	5	9	6	1
Full-time employees	292	99	49	235
Permanent positions	280	95	55	134
Temporary positions	17	13	0	102
Total	297	108	55	236

As at 31 December 2021

#### GRI 2 - 9

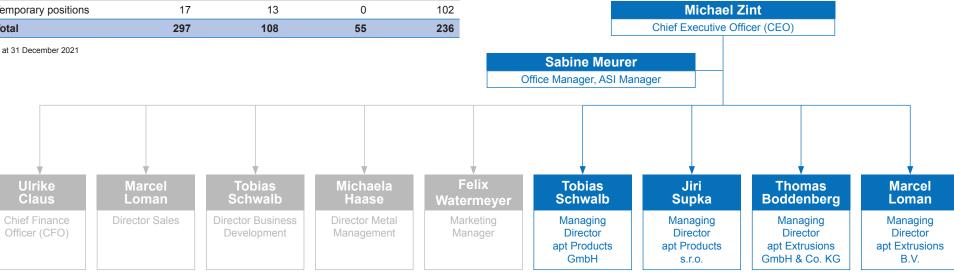
#### **Governance structure and composition**

See organisational diagram below.

#### GRI 2 - 11

#### Chair of the highest governance body

See organisational diagram below.



As at 1 September 2022

#### **GRI 2 - 12**

## Role of the highest governance body in overseeing the management of impacts

apt Holding GmbH is responsible for the strategic orientation of the apt Group and offers dedicated support through centralised functions.

#### **GRI 2 - 14**

#### Role of the highest governance body in sustainability reporting

This report and the major topics it addresses have been reviewed by the highest governance body and approved for publication. This took place by way of three separate and independent reviews:

- » Review and evaluation of major topics by the apt Sustainability Committee
- » Gathering and review of reporting information by the responsible managers
- » Review and approval of the final report by the CEO

#### **GRI 2 - 16**

#### **Communication of critical concerns**

No grievances were raised at any of the locations in the reporting year, with the exception of customer complaints. Due to the self-administration proceedings, there were critical concerns at apt Products GmbH that were resolved systematically and with the involvement of all stakeholders as part of the settlement process.

#### **GRI 2 - 17**

#### Collective knowledge of the highest governance body

The highest governance body and the management teams of all apt Group plants are involved in the process of developing the transformation strategy. This process is monitored by an external sustainability consultant for quality assurance purposes.

#### **GRI 2 – 26**

#### Mechanisms for seeking advice and raising concerns

Complaints, claims and requests for information submitted by stakeholders are systematically recorded and processed by the apt Group. apt Extrusions GmbH & Co. KG plans to introduce a complaints management/whistle-blower system by Q1 2023.



#### **GRI 2 - 27**

#### **Compliance with laws and regulations**

There were no violations of laws or regulations by apt Holding GmbH, apt Extrusions GmbH & Co. KG (DE), apt Extrusions B.V. (NL), apt Products GmbH (DE) or apt Products s.r.o. (CZ) in the reporting period.

All legal requirements and regulations were complied with in the settlement of the self-administration of apt Products GmbH (DE).

apt Extrusions B.V. (NL) was fined for violating occupational health and safety legislation in 2020. The resulting measures are explained under GRI 403.

No fines or sanctions were imposed on apt Holding GmbH, apt Extrusions GmbH & Co.KG (DE) or the two apt Products plants in Germany and the Czech Republic.

#### **GRI 2 - 28**

#### **Membership associations**

We are active members of selected organisations and groups, including the German aluminium industry association Aluminium Deutschland and Verband für die Oberflächenveredelung von Aluminium, where we contribute our wealth of experience and expertise to help shape a sustainable future. This includes playing an active role in the recycling working group of Aluminium Deutschland.

- » Member of the Aluminium Stewardship Initiative
- » Active member of the Aluminium Deutschland association
- » Active member of Verband der Oberflächenveredelung von Aluminium
- Membership of ION (Dutch industrial surface finishing organisation)
- » apt Products GmbH is a member of vbm Verband der Bayerischen Metall und Elektro-Industrie e. V. (Bavarian metalworking and electrical engineering industry association)









#### GRI 2 - 29

#### Approach to stakeholder engagement

The stakeholders of apt Group have been defined in accordance with DIN EN ISO 9001 and are presented in the illustration opposite.

One of the tasks in the strategy development process is to allocate stakeholders to stakeholder groups. Stakeholder engagement is in place with customers, employees and suppliers. Developing a fully fledged stakeholder engagement process will form part of the transformation strategy.





#### **GRI 2 – 30**

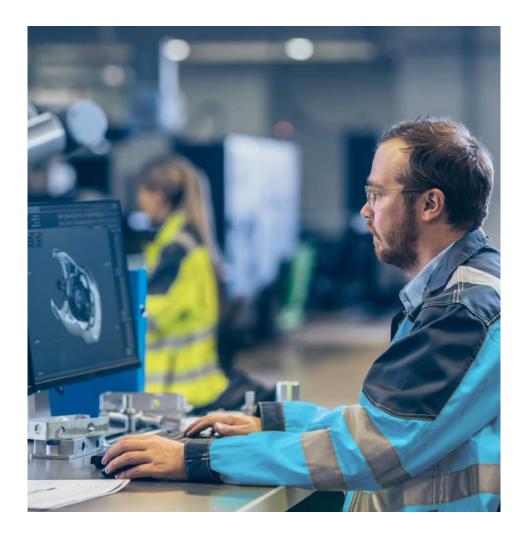
#### **Collective bargaining agreements**

apt Extrusions GmbH & Co. KG has a collective bargaining agreement with IG Metall, which covers 95.1% of employees. The remaining 4.9% not covered by the agreement are predominantly management staff.

apt Extrusions B.V. has a collective bargaining agreement with CAO Metalektro, which covers 100% of employees.

No collective bargaining agreement is in place at apt Products s.r.o.

At apt Products GmbH, a company agreement linked to a collective bargaining agreement on pay with IG Metall had been in place since 14 March 2017. As part of the restructuring process (from 15 December 2020 to 30 June 2021), a collective recovery agreement until 31 December 2023 was concluded.



## **GRI 3: Material topics**

#### GRI 3 – 1

#### **Process to determine material topics**

The process of determining material topics at apt Group involves collating relevant concerns in the aluminium industry and monitoring and analysing competitors.

Stakeholder dialogue is currently maintained through employee surveys and regular face-to-face contact with customers. apt Group is also in regular dialogue with local authorities. In the process of developing and finalising the transformation strategy, these topics will be compared and contrasted so that areas of action can be defined and objectives set. The management approach to all material topics will emerge as a result of the transformation strategy, which is still to be defined.





**GRI 3 – 2** 

List of material topics

Electricity Gas ENERGY

**EMISSIONS** Mobility

Suppliers MATERIALS

**WASTE** Packaging

Production WATER AND EFFLUENTS

OCCUPATIONAL HEALTH AND SAFETY Further training and education

**Diversity LABOUR** 

**EMPLOYEE SATISFACTION** 

Non-discrimination Economic success Customer relationships

### **GRI 202: Market presence**

#### **GRI 202 - 1**

## Ratios of standard entry level wage by gender compared to local minimum wage

Our employees' wages and salaries are based on pay levels defined in collective bargaining agreements and therefore constitute competitive remuneration.

We also offer comprehensive additional services, such as company pensions and discounted health insurance tariffs in Roermond (NL).

In Cheb (CZ), employees are paid in accordance with the national minimum wage, and contributions are made to their pensions.

#### **GRI 202 – 2**

#### Proportion of senior management hired from the local community

As the largest local employer in both Monheim and Roermond, we place great importance on hiring senior management personnel from the local community. A total of 78.26% of the senior management at apt Extrusions GmbH & Co. KG (DE) are from within 50km of the location. At apt Extrusions B.V. (NL), 83.3% of the senior management are from within 50km of the location.

The proportion of senior management at apt Products s.r.o. (CZ) and at apt Products GmbH who are from within 50km of the locations is 100% and 80% respectively.





## **GRI 204: Procurement practices**

A number of criteria apply when selecting suppliers of raw materials:

- » Quality
- » Production of primary aluminium using hydropower and geothermal energy with the aim of further reducing CO₂ emissions in the manufacturing process and in our products
- » Sustainability certification (ASI/Cradle to Cradle)

#### Additional aspects include:

- » Recycling secondary aluminium to produce billets at facilities near to our production sites, with the aim of lowering energy consumption and minimising journey times
- » For 2023, apt aims to procure aluminium billets from ASI Performance Standard-certified suppliers.
- » Security of supply
- » Research and development expertise in processing raw materials for special applications

#### **GRI 204 - 1**

#### Proportion of spending on local suppliers

apt Extrusions GmbH & Co. KG (DE), apt Products GmbH (DE) and apt Products s.r.o. (CZ) procure 100% of their resources from European suppliers.

apt Extrusions B.V. (NL) procures 96% of its materials from Europe and 4% from suppliers outside of Europe.

### **GRI 301: Materials**

We ensure that resources are used sustainably both inside and outside of the company through our proactive system of environmental, energy and quality management. Proactive management is a part of our continuous improvement process. Our quality pledge includes continuously improving our production processes. Multiple project teams monitor the latest energy and environmental solutions on a daily basis.

#### **GRI 301 - 1**

#### Materials used by weight or volume

Tonnes of metal processed for on-site production in reporting year 2021:

apt Extrusions GmbH & Co. KG (DE)	42,634 tonnes
apt Extrusions B.V. (NL)	27,647 tonnes
apt Products GmbH (DE)	1,100 tonnes
apt Products s.r.o. (CZ)	1,613 tonnes

#### **GRI 301 – 2**

#### Recycled input materials used

Percentage of recycled input materials for manufactured products:

apt Extrusions GmbH & Co. KG (DE)	22.78%
apt Extrusions B.V. (NL)	19.69%

Only materials from the apt Extrusions plants' own foundry are included in these figures. apt Products plants use profiles manufactured at apt Extrusions plants. The proportion of recycled materials used by our suppliers varies depending on availability and is not included here.

#### GRI 301 – 3

#### Reclaimed products and their packaging materials

We recycle almost 100% of the extrusion process scrap produced within the apt Group in our foundry in Monheim, which can produce up to 18,000 tonnes of aluminium billets per year, which we then use to manufacture high-quality profiles.





### **GRI 302: Energy**

Both apt Extrusions plants have ISO 50001: 2018-certified energy management systems. apt Products GmbH's ISO 5001: 2018 energy management system was valid until the end of 2021, but the certification was suspended as part of the restructuring process. Re-certification is planned for 2023/2024.

An energy team was set up at apt Extrusions B.V. (NL) in 2020 to review and evaluate potential for more-efficient energy use. From 2022, this team will be allocated a budget to implement measures efficiently and on a low-threshold basis. The energy team at apt Extrusions GmbH & Co. KG (DE) meets every four weeks to optimise energy consumption on an ongoing basis. Both apt Products plants also have energy teams in place to optimise processes locally, apt Products s.r.o. already has a photovoltaic system.

In the future, the apt Group intends to work together with a partner to develop a decarbonisation roadmap that is aligned with the task of keeping global warming to less than 1.5 degrees Celsius.

Specific goals will be defined within the scope of the transformation strategy.







#### GRI 302 – 1

#### **Energy consumption within the organisation**

	2020	2021	Change
Gas consumption (kWh)			
apt Extrusions GmbH & Co. KG (DE)	42,278,752	48,040,444	+ 13.6%
apt Extrusions B.V. (NL)	23,592,590	24,549,850	+ 4 %
apt Products GmbH (DE)	3,354,997	2,669,778	- 20.4%
apt Products s.r.o. (CZ)	143,212	147,461	+ 0.03%
Total	69,366,551	75,407,533	+ 8.7%

Electricit	cy consumption (kWh)			
apt Extru	sions GmbH & Co. KG (DE)	21,336,937	29,253,827	+ 37.1%
of which:	electricity mix	9,601,622	13,164,222	+ 37.1%
	electricity from renewable sources	11,735,315	16,089,605	+ 37.1%
apt Extru	sions B.V. (NL)	13,587,753	15,064,213	+ 10.9%
of which:	electricity mix	13,578,753	15,064,213	+ 10.9%
	electricity from renewable sources			_
apt Produ	ucts GmbH (DE)	3,001,344	2,411,720	- 19.6%
of which:	electricity mix	3,001,344	1,131,097	- 62.3%
	electricity from renewable sources	_	1,280,623	_
apt Produ	ucts s.r.o. (CZ)	2,951,300	3,352,240	+ 13.6%
of which:	electricity mix	2,825,279	3,209,099	+ 13.6%
	electricity from renewable sources	126,021	143,141	+ 13.6%
Total		40,877,334	50,082,000	+ 22.5%

#### GRI 302 – 3

#### **Energy intensity**

	2020	2021	Change
Gas intensity (kWh/t)			
apt Extrusions GmbH & Co. KG (DE)	1,145	1,127	- 1.5%
apt Extrusions B.V. (NL)*	806	757	- 6.0%
apt Products GmbH (DE)**	_	_	_
apt Products s.r.o. (CZ)**	_	_	_

Electricity intensity (kWh/to)			
apt Extrusions GmbH & Co. KG (DE)	578	686	+ 18.7%
apt Extrusions B.V. (NL)*	464	464	0.0%
apt Products GmbH (DE)**	_	_	_
apt Products s.r.o. (CZ)**	_	_	_

<sup>\*</sup> Per tonne is calculated as per extruded tonne and not as per invoiced tonne.

<sup>\*\*</sup> apt Products plants are on a different level of value creation, which is why energy intensity is not calculated for them.

### **GRI 303: Water and effluents**

All apt Extrusions and apt Products plants have ISO 14001: 2015-certified environmental management systems in place that cover water and effluents.

#### GRI 303 - 1

#### Interactions with water as a shared resource

Water is primarily used in the filter press as well as in surface treatment and powder coating due to the nature of these processes.

#### GRI 303 - 3, 4 and 5

#### Water withdrawal, water discharge, water consumption

	2020	2021	Change
Water withdrawal (m³)			
apt Extrusions GmbH & Co. KG (DE)	209,179	243,632	+ 16.5%
apt Extrusions B.V. (NL)	_	180,775	_
apt Products GmbH (DE)	11,647	10,024	- 13.9%
apt Products s.r.o. (CZ)	2,297	2,556	+ 11.3%
Total	223,123	436,987	
Water discharge (m³)			
apt Extrusions GmbH & Co. KG (DE)	153,656	188,927	+ 23%
apt Extrusions B.V. (NL)*	_	117,113	_
apt Products GmbH (DE)	_	_	_
apt Products s.r.o. (CZ)	134.5	106.2	- 21.0%
Total	153,790.5	306,146.2	
Industrial water consumption (m³)			
apt Extrusions GmbH & Co. KG (DE)	51,905	48,835	- 5.9%
apt Extrusions B.V. (NL)	_	45,141	_
apt Products GmbH (DE)	_	_	_
apt Products s.r.o. (CZ)	_	_	_
Total	51,905	93,976	
Drinking water consumption (m³)			
apt Extrusions GmbH & Co. KG (DE)	3,618	5,870	+ 62.2%
apt Extrusions B.V. (NL)	_	21,311	_
apt Products GmbH (DE)	_	_	_
apt Products s.r.o. (CZ)	_	_	_
Total	3,618	27,181	



# **GRI 304: Biodiversity**

Biodiversity reports were commissioned for the two apt Extrusions plants in order to develop a biodiversity management approach. The next step will be to take action on the basis of the findings from these reports.

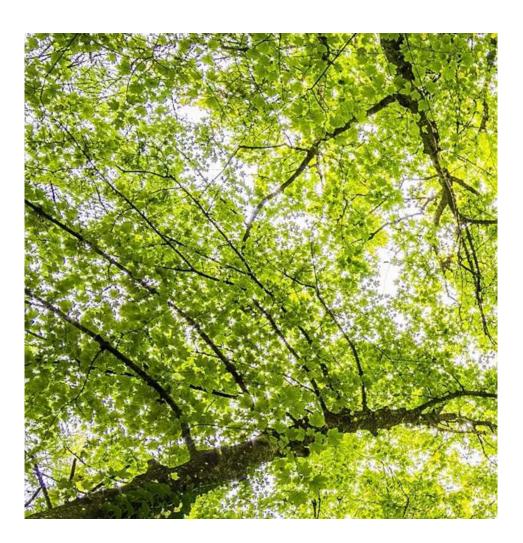
#### GRI 304 - 1

Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

All indicators listed in GRI 304: Biodiversity 2015 form part of the biodiversity risk analysis reports for apt Extrusions, Monheim (DE), and apt Extrusions, Roermond (NL), both of which were prepared by Pulswerk GmbH on 16 November 2021.

apt Extrusions GmbH & Co. KG and apt Extrusions B.V. are not located in protected areas.

In reporting year 2021, there were no discharges or leaks at apt Extrusions GmbH & Co. KG (DE) in Monheim, apt Extrusions B.V. (NL) in Roermond, apt Products GmbH (DE) in Eckental or apt Products s.r.o. (CZ) in Cheb – Dolní Dvory.



### **GRI 305: Emissions**

#### GRI 305 – 1, 2, and 3

The apt Group's carbon footprint was calculated and certified in accordance with the GHG Protocol Corporate Standard: 2004 for the first time in 2021. The calculation included the Scope 1 to 3 emissions of apt Holding and the apt Extrusions plants in Monheim and Roermond. The carbon footprints of the two apt Products plants have not yet been calculated.

	2020	2021	Change
Greenhouse gas emissions, Scope 1, t CO₂e			
apt Extrusions GmbH & Co. KG (DE)	8,686	9,802	12.8%
apt Extrusions B.V. (NL)	5,335	5,517	+ 3.4%
Greenhouse gas emissions, Scope 2, t CO₂e			
apt Extrusions GmbH & Co. KG (DE)	7,391	7,082	- 4.2%
apt Extrusions B.V. (NL)	5,530	3,125	- 43.5%
Greenhouse gas emissions, Scope 3, t CO₂e			
apt Extrusions GmbH & Co. KG (DE)	188,828	222,758	17.9%
apt Extrusions B.V. (NL)	143,838	153,223	+ 6.5%
Greenhouse gas emissions, t CO₂e / t Al, Scope 1			
apt Extrusions GmbH & Co. KG (DE)	0.24	0.23	- 4.2%
apt Extrusions B.V. (NL)	0.21	0.20	- 4.8%
Greenhouse gas emissions, t CO₂e / t Al, Scope 2			
apt Extrusions GmbH & Co. KG (DE)	0.20	0.17	- 15%
apt Extrusions B.V. (NL)	0.22	0.11	- 50%
Greenhouse gas emissions, t CO₂e / t Al, Scope 3			
apt Extrusions GmbH & Co. KG (DE)	5.11	5.22	2.1%
apt Extrusions B.V. (NL)	5.79	5.57	- 3.8%

apt Extrusions GmbH & Co. KG's emissions of gases other than CO₂ are regularly checked by Düsseldorf district council. apt in Monheim is exempted from annual emissions measurements, as its figures are lower than the legal limits.





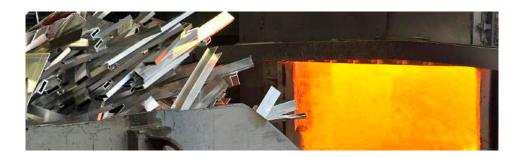
### GRI 306: Waste

All locations have an ISO 14001: 2015 environmental management system that covers waste management.

#### GRI 306 - 1

#### Waste generation and significant waste-related impacts

We recycle almost 100% of the extrusion process scrap within the apt Group at our foundry in Monheim. By turning process scrap into aluminium billets at our in-house foundry and feeding these secondary materials back into the manufacturing process, we can reuse up to 18,000 tonnes of aluminium every year. Aluminium can be recycled time and again without any loss of quality using a process that only requires around 5% of the energy needed to manufacture primary aluminium. Even residual materials from the foundry or the water used in the anodising systems are recycled.



GRI 306 - 3, 4 and 5

Waste generated, waste diverted from disposal, waste directed to disposal

All waste directed to disposal is disposed of by certified companies.

		apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
Total waste	(t)	8,749.21	3,239.14	596.00	162.74
Non-hazardo	ous waste (t)	2,964.36	2,182.44	415.00	46.99
of which:	Waste diverted to recycling (t)	1,363.72	2,182.44	349.00	19.93
	Waste directed to disposal (t)	1,600.64	0	66.00	27.06
Hazardous v	waste (t)	5,784.85	1,056.71	181.00	115.74
of which:	Waste diverted to recycling (t)	5,636.20	1,032.40	33.60	0
	Waste directed to disposal (t)	148.65	24.31	147.40	115.74

# GRI 308: Supplier environmental assessment

All suppliers are required to fulfil quality and environmental criteria before they work with the apt Group. These criteria include the requirements concerning procurement practices defined in GRI 204. Plans are in place to switch the supplier assessment and selection process to Ecovadis in Monheim (DE). If the feedback is positive, the system will be rolled out to Roermond (NL) and the two other locations. The management approach will be defined on this basis.

 $\rightarrow$  see pp. 14 and 15

#### **GRI 308 - 1**

#### New suppliers that were screened using environmental criteria

All new strategic suppliers of core materials required for our manufacturing operations were assessed according to quality and environmental criteria in 2021. Certification according to the ISO 9001 quality management standard, which includes a number of environmental criteria, is currently mandatory for all apt Group suppliers. apt Products s.r.o. screens all suppliers according to the ISO 14001 certification. All major suppliers are ISO 14001-certified.

#### **GRI 308 - 2**

#### Negative environmental impacts in the supply chain and actions taken

There are no known negative environmental impacts in the supply chain.

## **GRI 401: Employment**

An internal audit based on the SA8000 international standard was carried out at the apt Extrusions plants for the first time in 2021, with the aim of improving working conditions for employees. The findings of the audit, and the measures derived from it, are currently being transposed into a management approach.

#### **GRI 401 - 1**

#### New employee hires and employee turnover

	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
New hires	20	21	5	23
Employees who have left the company	21	19	35	30

#### GRI 401 - 3

#### Parental leave

	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
Female employees on parental leave	2	0	3	3
Male employees on parental leave	5	4	1	0



# **GRI 402: Labor/management relations**

#### **GRI 402 - 1**

#### Minimum notice periods regarding operational changes

The statutory notice periods are complied with at all locations. All legal requirements relating to the self-administration and associated restructuring were also met.

Our business is all about people, our most valuable resource. We support our employees, as we recognise and understand that they are the key to our success.

This belief is ingrained in our corporate values and put into practice by our staff every day.



# **GRI 403: Occupational health and safety**

All apt Extrusions and apt Products plants have an external occupational health and safety officer, who provides support and guidance on health and safety issues. This person prepares an annual report for the management.

#### GRI 403 - 1

#### Occupational health and safety management system

Both apt Extrusions GmbH & Co. KG (DE) and apt Extrusions B.V. (NL) have implemented management systems that are based on the ISO 45001 standard but do not have external certification.

#### GRI 403 – 2

#### Hazard identification, risk assessment and incident investigation

Occupational risks and hazards are outlined in the occupational health and safety report.

#### apt Extrusions GmbH & Co. KG (DE)

Specific measures are documented in a dedicated list, which is updated weekly. Overarching measures for the year 2022 are as follows:

- 1. Reducing the number of reported incidents through regular inspections, risk assessments and ergonomic assessment of exposed workplaces.
- 2. Measuring hazardous materials at presses.
- 3. Organising four occupational health and safety committee meetings to address current occupational health and safety topics and initiate measures.

#### apt Extrusions B.V. (NL)

At apt Extrusions B.V. (NL), all major incidents are treated as separate projects and action taken to prevent them happening again is integrated into routine processes. An accident occurred in 2020 that was investigated in 2021 and resulted in a fine being imposed. All lifting equipment and instructions were revised after the incident, and employees received corresponding training. There are regular checks in place to ensure that these processes are being followed.

#### apt Products GmbH (DE)

Overarching measures for the year 2022 comprise reducing the number of reported incidents through regular inspections, risk assessments and ergonomic assessment of exposed workplaces, and organising four occupational health and safety committee meetings to address current occupational health and safety topics and initiate measures.

#### apt Products s.r.o. (CZ)

Every accident is investigated separately, and specific action is taken to prevent similar accidents from happening in the future.

#### GRI 403 - 3

#### Occupational health services

apt Extrusions B.V. (NL) has an in-house occupational health service that provides regular check-ups and vaccinations. The Monheim location has a similar service that performs all mandatory and optional check-ups, suitability



tests and pre-employment medical examinations defined in the German Ordinance on Preventive Occupational Health Care (ArbMedVV). The occupational health service at Monheim also attends regular occupational health and safety meetings.

#### GRI 403 - 5

#### Worker training on occupational health and safety

All employees must complete mandatory annual occupational health and safety training. In 2021, 100% of employees at all locations took part in the training.

#### GRI 403 - 6

#### Promotion of worker health

In Roermond, apt covers part of the monthly costs of membership at a local gym. apt Extrusions in Monheim organises and finances a weekly running group with a professional fitness coach. apt teams in Monheim also have the opportunity to participate in the annual Monheimer Gänseliesellauf running event. apt Extrusions in Monheim gives employees the chance to lease bicycles or pedelecs. The same initiative is also available in Roermond, where it is called FiscFree.

#### GRI 403 – 8

# Workers covered by an occupational health and safety management system

At apt Extrusion plants, 100% of employees are covered by a management system based on ISO 45001.

#### GRI 403 - 9

#### **Work-related injuries**

	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
Number of deaths due to work-related injuries	0	0	0	0
Number of work-related injuries with severe consequences	0	1	0	0
Number of documentable work-related injuries	94	31	5	8
Most important types of work-related injuries	Bruising/crushing Cuts and grazes Burns	Cuts and grazes	Bruising/crushing Cuts and grazes	Bruising/crushing Cuts and grazes
Number of hours worked	442,741 hours	229,007 hours	148,695 hours	400,582 hours
Measures taken	_	Specific	_	_

## **GRI 404: Training and education**

We apply our employee qualification process to all apt Group locations and also offer an attractive range of benefits. Our team wants to never stop learning – and we give them the opportunities to do so, through training positions, personal development plans, special programmes for fostering new talent, language courses and internal training courses. Training is allocated a specific annual budget. Members of the management team can register interest in their annual development planning processes, which can then be acted on.

#### GRI 404 – 2

# Programs for upgrading employee skills and transition assistance programs

apt Products GmbH employees affected by the job losses that were part of the company's self-administration have the chance to switch to a transfer company where they can prepare for future career opportunities.

#### GRI 404 - 3

Percentage of employees receiving regular performance and career development reviews

All of our employees receive annual performance reviews. These meetings were voluntary in 2021 due to the pandemic, but are usually mandatory for all employees.



# **GRI 405: Diversity and equal opportunity**

GRI 405 - 1

Diversity of governance bodies and employees

Breakdown of governance bodies and management personnel				
	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)
By gender				
Female	20.0%	16.6%	0%	16.6%
Male	80.0%	83.4%	100%	83.4%
By age group				
Under 30	0%	0%	20%	0%
30 – 50	20.0%	38.9%	20%	83.4%
Over 50	80.0%	61.1%	60%	16.6%

## **GRI 406: Non-discrimination**

GRI 406 - 1

Incidents of discrimination and corrective actions taken

Incidents of discrimination					
	apt Extrusions GmbH & Co. KG (DE)	apt Extrusions B.V. (NL)	apt Products GmbH (DE)	apt Products s.r.o. (CZ)	
Total number of incidents of discrimination in the reporting period	0	0	0	0	
Status of the incidents	0	0	0	0	

There were no known incidents of discrimination in the reporting period.

# **GRI 407: Freedom of association** and collective bargaining

All locations have a works council.

The works council at apt Extrusions GmbH & Co. KG (DE) has nine members. Meetings take place weekly. The works council addresses the following topics:

- » Conclusion of company agreements
- » Approval of additional work
- » Approval/discussion of recruitment, transfers, redeployment

The works council at apt Extrusions B.V. (NL) has nine members. It meets with the management four times per year and publishes its meeting minutes. Employees are released from their work duties for works council affairs.

The works council of apt Products GmbH consisted of 7 people up to April 2021 and 5 people from May 2021 onwards. It meets weekly and has meetings with the management every month. Its activities are focused on the following:

- » Conclusion of company agreements
- » Approval of additional work
- » Approval/discussion of recruitment, transfers, redeployment

The representatives of the apt Products s.r.o. works council meet once per quarter and on an ad hoc basis. All employees have the opportunity to submit ideas, suggestions or comments through the works council representatives. Minutes of all works council meetings are taken and published.

#### **GRI 407 - 1**

Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

The right to freedom of association and collective bargaining is not at risk at apt Extrusions GmbH & Co. KG (DE) or apt Extrusions B.V. (NL). No such supplier assessment has been carried out so far, but will be conducted as part of the Ecovadis roll-out.

# GRI 409: Forced or compulsory labor

#### GRI 409 - 1

Operations and suppliers at significant risk for incidents of forced or compulsory labor

The four apt Group plants do everything possible to combat modern slavery. A management system based on SA8000 (not certified) has been developed at the two apt Extrusions plants and is scheduled to be implemented next year.

Our supplier code of conduct prohibits all forced and child labour. Group-wide implementation is planned for 2022. The introduction of Ecovadis will help to ensure that the code of conduct is complied with.



# GRI 414: Supplier social assessment

We plan to introduce an assessment system for all suppliers through Ecovadis – initially at apt Extrusions GmbH & Co. KG in 2022 and then across the entire apt Group. The management approach will be developed on the basis of the results of this Ecovadis supplier assessment.

#### **GRI 414 - 1**

#### New suppliers that were screened using social criteria

All new suppliers were screened according to quality and environmental criteria in 2021. No screening using social criteria took place in 2021. Social screening is set to be introduced at apt Extrusions GmbH & Co. KG through Ecovadis in 2022. Following a successful introduction, the screening system will be expanded to the entire apt Group.

## **GRI 415: Public policy**

#### **GRI 415 – 1**

#### **Political contributions**

No political contributions were made in the reporting period.

# **GRI 418: Customer privacy**

#### GRI 418 - 1

Substantiated complaints concerning breaches of customer privacy and losses of customer data

There were no known complaints concerning breaches of customer privacy or losses of customer data in the reporting period.

apt Holding GmbH ensures compliance with the General Data Protection Regulation (GDPR) at all of its locations.

Dr Jörn Voßbein, UIMC DR. VOSSBEIN GmbH & Co KG, is the external data protection officer for apt Extrusions GmbH & Co. KG, apt Products GmbH and apt Holding GmbH. The apt Group website's privacy policy includes a link through which the data protection officer can be contacted directly.

A third party has been commissioned to provide assistance in GDPR-related issues at apt Extrusions B.V. (NL). This third party fulfils the function of a data protection and data security officer and carries out four audits per year. Processes and policies are updated as and when necessary.

apt Products s.r.o. (CZ) complies with the GDPR and the corresponding legal requirements.

## **GRI** content index 2021

Statement of use GRI Standard Applicable GRI Sector Standard(s)		The Extrusion and Products plants of the apt Group have reported in accordance with the GRI standards for the period 01.01.2021 to 31.12.2021. GRI 1: Foundation 2021					
							No Sector Standards applied
						Omission	
			Require- ment(s)				
GRI Standard	Disclosure	Location	omitted	Reason	Explanation		
GENERAL DISCLOSURES							
	2-1 Organisational details	p.4 et seq.; p. 20					
	2-2 Entities included in the organisation's sustainability reporting	p.6 et seq.; p. 20					
	2-3 Reporting period, frequency and contact point	p. 20					
	2-4 Restatements of information	p. 20					
	2-5 External assurance	p. 20					
	2-6 Activities, value chain and other business relationships	p. 21 et seq.					
	2-7 Employees	p. 23					
	2-8 Workers who are not employees		X	Information unavailable/incomplete			
	2-9 Governance structure and composition	p. 23					
	2-10 Nomination and selection of the highest governance body		X	Information unavailable /incomplete			
	2-11 Chair of the highest governance body	p. 23					
GRI 2: General Disclosures 2021	2-12 Role of the highest governance body in overseeing the management of impacts	p. 24					
	2-13 Delegation of responsibility for managing impacts		X	Information unavailable/incomplete	The process, and therefore the area of responsibility for impact management, is derived from the strategy that is currently being developed.		
	2-14 Role of the highest governance body in sustainability reporting	p. 24					
	2-15 Conflicts of interest		Х	Information unavailable/incomplete	The process and possible conflicts arise from the strategy, which is currently being developed.		
	2-16 Communication of critical concerns	p. 24					
	2-17 Collective knowledge of the highest governance body	p. 24					
	2-18 Evaluation of the performance of the highest governance body		Х	Information unavailable/incomplete	The process for evaluation stems from the strategy, which is currently being developed.		
	2-19 Remuneration policies		X	Confidentiality constraints			
	2-20 Process to determine remuneration		Х	Confidentiality constraints			
	2-21 Annual total compensation ratio		Х	Confidentiality constraints			
	2-22 Statement on sustainable development strategy	p. 2 et seq.					



	2-23 Policy commitments	apt Group corporate policy available for download at https://www.apt- alu-products. com/downloads/ zertifikate- datenblaetter/			
GRI 2: General Disclosures 2021	2-24 Embedding policy commitments		Х	Not applicable	There is no official commitment to internationally valid policies.
	2-25 Processes to remediate negative impacts		Х	Information unavailable/incomplete	
	2-26 Mechanisms for seeking advice and raising concerns	p. 24			
	2-27 Compliance with laws and regulations	p. 25			
	2-28 Membership associations	p. 25			
	2-29 Approach to stakeholder engagement	p. 26			
	2-30 Collective bargaining agreements	p. 27			
MATERIAL TOPICS	2 do Companyo Sangamming agreemente	p. 27			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 28			
	3-2 List of material topics	p. 29			
ECONOMIC PERFORMANCE		P. 20			
GRI 3: Material Topics 2021	3-3 Management of material topics	p.16 et seq., annual and management report published in Federal Gazette			
	201-1 Direct economic value generated and distributed	Annual and management report published in Federal Gazette			
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change		Х	Information unavailable/incomplete	The process of identifying potential and actual financial and actual risks and opportunities due to climate change will be developed within the framework of the strategy that is currently being developed.
	201-3 Defined benefit plan obligations and other retirement plans		Х	Confidentiality constraints	
	201-4 Financial assistance received from government	apt Holding GmbH has not received any financial support.			
MARKET PRESENCE					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Information unavailable/incomplete	The management approach for all Material Topics will emerge as a result of the transformation strategy yet to be developed.
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	p. 30			
	202-2 Proportion of senior management hired from the local community	p. 30			
NDIRECT ECONOMIC IMPACTS					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Information unavailable/incomplete	
GRI 203: Indirect Economic Impacts	203-1 Infrastructure investments and services supported		Х	Not applicable	Defined as not material
2016	203-2 Significant indirect economic impacts		Х	Not applicable	Defined as not material
PROCUREMENT PRACTICES					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 12 et seq.; p. 31			
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	p. 31			

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ANTI-CORRUPTION					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Information unavailable/incomplete	
•	205-1 Operations assessed for risks related to corruption		Х	Not applicable	Defined as not material
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures		Х	Not applicable	Defined as not material
	205-3 Confirmed incidents of corruption and actions taken		X	Not applicable	Defined as not material
ANTI-COMPETITIVE BEHAVIOUR					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Information unavailable/incomplete	
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	In the reporting powere no legal produe to anti-compete behaviour	ceedings	·	
TAX					
GRI 3: Material Topics 2021	3-3 Management of material topics		X	Not applicable	Defined as not material, as the apt Group complies with all legal and tax requirements of the respective local tax law.
	207-1 Approach to tax		Х	Not applicable	Defined as not material
CDI 207: Tay 2040	207-2 Tax governance, control, and risk management		Х	Not applicable	Defined as not material
GRI 207: Tax 2019	207-3 Stakeholder engagement and management of concerns related to tax		Х	Not applicable	Defined as not material
	207-4 Country-by-country reporting		Х	Not applicable	Defined as not material
MATERIALS					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 32			
	301-1 Materials used by weight or volume	p. 32			
GRI 301: Materials 2016	301-2 Recycled input materials used	p. 32			
	301-3 Reclaimed products and their packaging materials	p. 32			
ENERGY					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 34			
	302-1 Energy consumption within the organisation	p. 35			
	302-2 Energy consumption outside of the organisation		Х	Information unavailable/incomplete	
GRI 302: Energy 2016	302-3 Energy intensity	p. 35			
	302-4 Reduction of energy consumption	p. 35			
	302-5 Reductions in energy requirements of products and services		Х	Confidentiality constraints	
WATER AND EFFLUENTS					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 36			
	303-1 Interactions with water as a shared resource	p. 36			
	303-2 Management of water discharge-related impacts	p. 36			
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	p. 36			
	303-4 Water discharge	p. 36			
	303-5 Water consumption	p. 36			
BIODIVERSITY					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 37			
	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	p. 37			
ODI 004 D. II. II. 0040	304-2 Significant impacts of activities, products and services on biodiversity		Х	Information unavailable/incomplete	
GRI 304: Biodiversity 2016	304-3 Habitats protected or restored		Х	Information unavailable/incomplete	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations		Х	Information unavailable/incomplete	



EMISSIONS					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 38			
	305-1 Direct (Scope 1) GHG emissions	p. 38			
	305-2 Energy indirect (Scope 2) GHG emissions	p. 38			
	305-3 Other indirect (Scope 3) GHG emissions	p. 38			
	305-4 GHG emissions intensity	p. 00	X	Information unavailable/incomplete	
	305-5 Reduction of GHG emissions		X	Not applicable	This is the first CO, balance sheet that has been prepared. It
GRI 305: Emissions 2016	Coo o recutation of the dimensions		^	Not applicable	therefore serves as a base, and a reduction can only be reported in the next reporting period. Reduction targets and measures are defined as part of the strategy and reported accordingly.
	305-6 Emissions of ozone-depleting substances (ODS)		X	Information unavailable/incomplete	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions		Х	Information unavailable/incomplete	
WASTE					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 39			
	306-1 Waste generation and significant waste-related impacts	p. 39			
	306-2 Management of significant waste-related impacts		X	Information unavailable/incomplete	
GRI 306: Waste 2020	306-3 Waste generated	p. 39			
	306-4 Waste diverted from disposal	p. 39			
	306-5 Waste directed to disposal	p. 39			
SUPPLIER ENVIRONMENTAL ASSE	ESSMENT				
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 40			
GRI 308: Supplier Environmental	308-1 New suppliers that were screened using environmental criteria	p. 40			
Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	p. 40			
EMPLOYMENT					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 40 et seq.			
	401-1 New employee hires and employee turnover	p. 40			
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		Х	Information unavailable/incomplete	
	401-3 Parental leave	p. 40			
LABOR/MANAGEMENT RELATION	S				
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 14			
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	p. 41			
OCCUPATIONAL HEALTH AND SAF	ETY				
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 42 et seq.			
·	403-1 Occupational health and safety management system	p. 42			
	403-2 Hazard identification, risk assessment, and incident investigation	p. 42			
GRI 403: Occupational Health and Safety 2018	403-3 Occupational health services	p. 42			
	403-4 Worker participation, consultation, and communication on occupational health and safety		Х	Information unavailable/incomplete	
	403-5 Worker training on occupational health and safety	p. 43			
	403-6 Promotion of worker health	p. 43			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		Х	Information unavailable/incomplete	
	403-8 Workers covered by an occupational health and safety management system	p. 43			
	403-9 Work-related injuries	p. 43			
	403-10 Work-related ill health		X	Information unavailable /incomplete	Due to data protection regulations

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TRAINING AND EDUCATION					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 44			
GRI 404: Training and Education	404-1 Average hours of training per year per employee		Х	Information unavailable/incomplete	
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 44			
2016	404-3 Percentage of employees receiving regular performance and career development reviews	p. 44			
DIVERSITY AND EQUAL OPPORTU	NITY				
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 45			The process for determining materiality is part of the strategy an is currently in progress. This is the basis for the management approach.
GRI 405: Diversity and Equal	405-1 Diversity of governance bodies and employees	p. 45			
Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men		Х	Information unavailable/incomplete	
NON-DISCRIMINATION					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 45			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	p. 45			
FREEDOM OF ASSOCIATION AND C	OLLECTIVE BARGAINING				
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 46			
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 46			
CHILD LABOR					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 12 et seq.			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	There is no risk of child labour in the apt plants in DE, NL and CZ	Х	Information unavailable/incomplete	Will be collected as part of the supplier evaluation by Ecovadis.
FORCED OR COMPULSORY LABOR					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 12 et seq.; p. 46			Process will be underpinned within the strategy.
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	p. 46			
SECURITY PRACTICES					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х		The process for determining materiality is part of the strategy an is currently in progress. This is the basis for the management approach.
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures		Х		Will be collected as part of the supplier assessment by Ecovadis
RIGHTS OF INDIGENOUS PEOPLES					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Information unavailable/incomplete	The process for determining materiality is part of the strategy an is currently in progress. This is the basis for the management approach.
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples		Х	Information unavailable/incomplete	Will be collected as part of the supplier assessment by Ecovadis
LOCAL COMMUNITIES					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 14 et seq.			
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs		Х	Information unavailable/incomplete	Process will be underpinned within the strategy.
	413-2 Operations with significant actual and potential negative impacts on local communities		Х	Information unavailable/incomplete	The process of identification will be underpinned within the strat and the result will be communicated.
SUPPLIER SOCIAL ASSESSMENT					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 12 et seq., p. 47			
GRI 414: Supplier Social Assessment	414-1 New suppliers that were screened using social criteria	p. 47			
2016	414-2 Negative social impacts in the supply chain and actions taken		Х	Information unavailable/incomplete	Will be collected as part of the supplier assessment by Ecovadis



PUBLIC POLICY					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 47			
GRI 415: Public Policy 2016	415-1 Political contributions	p. 47			
CUSTOMER HEALTH AND SAFETY					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Not applicable	apt is a supplier. Therefore, the responsibility for the health and safety of the end customer lies with the final-stage manufacture.
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories		Х	Not applicable	see above
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services		Х	Not applicable	see above
MARKETING AND LABELING					
GRI 3: Material Topics 2021	3-3 Management of material topics		Х	Not applicable	apt is a supplier. Therefore, the responsibility for the health and safety of the end customer lies with the final-stage manufacture
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling		Х	Not applicable	see above
	417-2 Incidents of non-compliance concerning product and service information and labeling		Х	Not applicable	see above
	417-3 Incidents of non-compliance concerning marketing communications		Х	Not applicable	see above
CUSTOMER PRIVACY					
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 47			
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 47			

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