ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Aluflexpack Novi d.o.o. (Drniš) and Process Point Service AG (Einsiedeln)

CERTIFICATE NUMBER
132

ASI STANDARD
PERFORMANCE STANDARD (V3 2022)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
TÜV RHEINLAND CERT GmbH

DATE OF ISSUE
25 FEBRUARY 2025

DATE OF EXPIRY
24 FEBRUARY 2028

CERTIFIED SINCE
27 APRIL 2021

AUTHORISED BY

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

CERTIFICATION SCOPE

Production of flexible packaging and conversion of Aluminium foil, paper and flexible films, including the printing, coating and extrusion of Aluminium at Aluflexpack Novi d.o.o. plant Drniš (Croatia) and production of Aluminium capsules and Aluminium containers and lids for pet food at Process Point Service AG Einsiedeln (Switzerland).

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Aluflexpack
ENTITY NAME	Aluflexpack Novi d.o.o. (Drniš) and Process Point Service AG (Einsiedeln)
CERTIFICATION SCOPE	Production of flexible packaging and conversion of Aluminium foil, paper and flexible films, including the printing, coating and extrusion of Aluminium at Aluflexpack Novi d.o.o. plant Drniš (Croatia) and production of Aluminium capsules and Aluminium containers and lids for pet food at Process Point Service AG Einsiedeln (Switzerland).
SUPPLY CHAIN ACTIVITIES	• Material Conversion
ASI STANDARD	• Performance Standard V3
AUDIT TYPE	• Initial Certification Audit (9 – 10 February 2021) • Surveillance Audit (19 July 2021) • Scope Change Audit (23 – 25 March 2022) • Surveillance Audit (12 December 2022) • Re-Certification Audit and Scope Change (5, 13 - 15 June and 27 July 2023) • Surveillance Audit (10 May 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	• 9 – 10 February 2021 (Initial Certification Audit) • 19 July 2021 (Surveillance Audit) • 23 – 25 March 2022 (Scope Change Audit) • 12 December 2022 (Surveillance Audit) • 5, 13 - 15 June and 27 July 2023 (Re-Certification Audit and Scope Change) • 10 May 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 7 April 2021 (Initial Certification Audit) • 10 September 2021 (Surveillance Audit) • 31 May 2022 (Scope Change Audit) • 13 June 2023 (Surveillance Audit) • 13 March 2024 (Re-Certification Audit and Scope Change) • 26 January 2025 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (9 – 10 February 2021) The Audit Scope includes the activities of coating and extrusion of Aluminium at the Aluflexpack Novi Drniš plant. Supply chain activities included in the Audit Scope: • Material Conversion (Production and Transformation)

	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. At the time of the Audit (February 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. Surveillance Audit (19 July 2021) The Audit Scope includes the activities of coating and extrusion of Aluminium at the Aluflexpack Novi Drniš plant (Croatia). Supply chain activities included in the Audit Scope: • Material Conversion (Production and Transformation) All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Scope Change Audit (23 - 25 March 2022) The Audit Scope includes the activities of the factory Process Point Service AG facility in Einsiedeln, Switzerland. Supply chain activities included in the Audit Scope: • Material Conversion (Production and Transformation) All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (12 December 2022) The Audit Scope includes the Aluflexpack Novi Drniš plant (Croatia) and Process Point Service AG (Switzerland). Supply chain activities included in the Audit Scope: • Material Conversion (Production and Transformation) Criteria in the ASI Performance Standard that were identified as non-conformities from the previous surveillance audit were included in the audit scope. The audit has been undertaken as a 'desktop' exercise consistent with the Entity's overall maturity level and the audit type. Re-Certification Audit and Scope Change (5, 13 - 15 June and 27 July 2023) The Audit Scope includes the Aluflexpack Novi Drniš plant (Croatia) and Process Point Service AG (Switzerland). Supply chain activities included in the Audit Scope: • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (10 May 2024) The Audit Scope includes the Aluflexpack Novi Drniš plant (Croatia) and Process Point Service AG (Switzerland). Supply chain activities included in the Audit Scope: • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

	☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	25 February 2025 – 24 February 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	25 August 2026
CERTIFICATE NUMBER	132

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

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

ENTITY OVERVIEW

The Aluflexpack Group has specialised in the development and manufacturing of flexible packaging and barrier solutions for over 40 years. Headquartered in Reinach (AG), Switzerland, the group operates through 14 integrated locations across Europe. This includes sales and administrative offices in Austria, a logistics centre in Poland, and sales offices in Poland and Liechtenstein. Additionally, the group has factories in France, Switzerland, Poland, Turkey, and Croatia. Aluflexpack Group is the owner of Aluflexpack Novi d.o.o. and parent company of Process Point Service AG, Switzerland, and is part of the industrial group Montana Tech Components. Together the two Facilities of Aluflexpack Novi d.o.o. Drniš, Croatia and Process Point Service AG, Switzerland constitute the 'Entity'.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard's legal Compliance requirements. There are systems in place (e.g. legal database) to maintain awareness of and to ensure Compliance with Applicable Law. The Entity holds both ISO 9001 and BRC certifications from an accredited certification body. The Drniš site is certified also against ISO 14001. The Aluflexpack Group supports the Entity's sites with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity has implemented systems to avoid Corruption in all its forms. The Entity subscribes to the ETI (Ethical Trading Initiative) base code. Risk of Corruption has been evaluated and business software is used to register all business transactions. All relevant financial transactions are cashless. Employees received mandatory and periodic anti-Corruption training. As the Entity is a manufacturing organisation, raw material purchasing and sales activities are undertaken by the Aluflexpack Group, not by the Entity's sites. Annual tax audits check proper business conduct. Gifts and entertainment are regulated, as well as travel. The Aluflexpack Group has considered Corruption as part of its risk assessment.
1.3a-e Code of Conduct	Conformance	The Entity has issued and made publicly available its Code of Conduct available at: https://www.aluflexpack.com/wp-content/uploads/2023/06/Aluflexpack-Code-of-Conduct_2023.pdf The Code was reviewed in February 2023. And includes principles relevant to environmental, social and governance performance. The Entity has implemented a regular training programme for employees.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has published and communicated the Aluflexpack Code of Conduct in English and the "Ethical Principles" document in local languages. It is clearly stated that the Entity in no way tolerates Corruption, anti-trust violations, Bribery, money laundering, unfair advantages, or prohibited agreements. The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the Standard. Refer to: https://www.aluflexpack.com/wp-content/uploads/2023/06/Aluflexpack-Code-of-Conduct_2023.pdf The Entity has conducted training for its employees to make them aware of the Policies. The policies are endorsed by senior management.
2.2a-c Leadership	Conformance	At each site, the Entity has nominated a person at the senior management level who has overall responsibility and authority for ensuring conformance with this Standard and ensuring sufficient resources to support its implementation.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Drniš Facility has implemented an Environmental Management System, certified to ISO 14001:2015 by an accredited certification body and is consistent with their ASI Performance Standard Certification Scope.

CRITERION	RATING	COMMENT
		The Einsiedeln Facility has implemented an Environmental Management System which is appropriate for the size and nature of the Business. Due to low environmental impact, the management of the Facility decided to not certify the Environmental Management System.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented a Social Management System (Aluflexpack Drniš: SMETA, ECOVADIS Silver and Process Point Service AG Einsiedeln: SMETA). There were no non-conformities open from the latest audit in 2019. 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 Occupational Health and Safety, which has been directed by the requirements of the SA8000 standard.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a system and practices for responsible sourcing. The Entity strives to source Aluminium only from ASI Certified suppliers. These either have been Certified or are working towards Certification. All direct suppliers are located in Europe. Supplier evaluation is carried out for non-metal suppliers. The Entity is periodically rated by ECOVADIS. The Entity's Sustainable Procurement Policy is available at: https://www.aluflexpack.com/wp-content/uploads/2023/02/Sustainable-procurement-policy_10.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	The Aluflexpack Group has issued a documented procedure related to Environmental and Social Impact Assessments. For the current project (expansion of production and construction of new production hall) at Drniš, an elaborated Environmental Impact Assessment has been undertaken in 2021. The Drniš site holds an ISO 14001 certificate. The Drniš site is located in an industrial zone. The size and nature of the project did not trigger a Social Impact Assessment.
2.6a-h Human Rights Impact Assessment	Conformance	The Aluflexpack Group has issued a documented procedure for Human Rights Impact Assessments. The current project in Drniš (expansion of production and construction of new production hall) takes place within the existing boundaries of the property within an industrial zone. There are no neighbours in the vicinity and as such no risks for negative Human Rights impacts have been identified by the Entity.
2.7a-f Emergency Response Plan	Conformance	As confirmed by document review and interviews, the Entity has site specific Emergency Response Plans developed and implemented in collaboration with relevant Stakeholders (e.g. fire brigade in Drniš, landlord in Einsiedeln). The Drniš facility also holds an ISO 14001 certificate which is current to the site's Certification Scope under the ASI Performance Standard. Relevant Stakeholders can access a copy of the emergency plan on demand.
2.8a-d Suspended Operations	Conformance	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.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	At the time of the Audit, no Mergers or Acquisitions were being planned, and the Entity was not in a post-merger situation. The Entity has not undergone or planned a merger or acquisition (M&A) since Aluflexpack joined ASI. Mergers and Acquisitions are managed at a Group level.
2.10a-b Closure, Decommissioning and Divestment	Conformance	At the time of the Audit, there were no Closure, Decommissioning or Divestments planned. Closure, Decommissioning and Divestments are managed at a Group level.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social and economic impacts in its 2023 Sustainability Report, available at: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf
3.2 Non-compliance and Liabilities	Conformance	In the Entity's 2023 Sustainability Report (refer page 44 https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf), the Entity has publicly confirmed that throughout 2023, it experienced zero instances of non-compliance related to the health and safety impacts of our products, with no product recalls on the market. Furthermore, the Entity had no compliance issues related to environment and governance topics in 2022 and 2023.
3.3a-c Payments to Governments	Conformance	Information on Payments to Governments is publicly available in the 2023 Sustainability Report on page 42: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf The Entity has stated that according to its governance framework, it abstains from making contributions to political parties.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	A Grievance Mechanism has been implemented by the Entity. All grievances can be submitted via e-mail (accessible via https://www.aluflexpack.com/contact). The mechanism can be used to report breaches of the Entity's Code of Conduct or violations of the law including issues relating to Bribery and Corruption, competition law, fraud, financial crime, safety and quality issues, Harassment and Discrimination, international trade controls, protection of personal data, rights and protection of individuals, serious environmental damage or conflicts of interest. The Entity has reported this mechanism in its 2023 Sustainability Report on page 43 (https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf).
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity uses an external service provider to generate Product Life Cycle Assessments (LCAs). Through the use of this tool, the Entity can respond to customer requests concerning their individual Products. For the time being, the Entity does not publish its LCAs but makes them available on customer request.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	At present, the Entity does not intend to publish its LCAs but will make them available upon customer request.
4.2 Product Design	Conformance	The Entity is committed to its sustainability strategy that encompasses integrating sustainability objectives into the design and development process of Products or components to enhance Circular Economy outcomes. The Entity has set performance indicators and targets in its sustainability strategy and roadmap that are aligned with a Circular Economy concept.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has a system and processes implemented to ensure that all Aluminium Scrap from production processes are collected for recycling. Alloys of similar composition are not collected separately as they are recycled in the same way. The Entity works to minimise the generation of Aluminium Process Scrap and all Workers are trained in the collection of Aluminium throughout the site.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Aluflexpack Group has developed a Product Strategy to foster circularity, refer to: https://www.aluflexpack.com/de/drive-circularity However, the Entity has not demonstrated that it has implemented a recycling strategy, including specific timelines, activities and targets and that this strategy has been made publicly available. Site-specific data have not been published to date, although they are available on request. The Entity intends to make these data publicly available in the near future.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity supplies its Products to various industries and does not sell directly to consumers. It has initiated a project called "Drive recycling together" which focuses on the whole supply chain to foster the recycling of its Products. The Entity is also working with CEFLEX, an initiative whose members are companies, associations, academic institutions, governmental and non-governmental organisations from the flexible packaging value chain to foster the Circular Economy. The Entity has demonstrated that it engages with collection and recycling systems to support efforts to increase recycling rates in their respective markets.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	In its 2023 Sustainability Report, the Aluflexpack Group has publicly reported on the Entity's GHG emissions, refer to pages 15, 46, 50 and 51: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf The data have been independently verified prior to publication (limited assurance).
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 -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has issued its Greenhouse Gases (GHG) emissions reduction plans for both of its sites, which are consistent with a 1.5°C warming scenario. The Entity has correctly used the ASI Entity GHG Pathways Method and Calculation Tool, and its emission reduction plans are in line with the requirements of this Criterion. The GHG emissions and energy situation is reviewed by the Entity's management on an annual basis. The Group's GHG reduction performance has been made publicly available in the 2023 Sustainability Report and the GHG Emissions Reduction Pathway and GHG Emissions Reduction Plan have been publicly disclosed, refer to: https://www.aluflexpack.com/wp-content/uploads/2024/05/Aluflexpack-Novi_Drnis_GHG-reduction-pathway.pdf The Entity has defined its baseline year as 2023, and as such, progress will be reported in future. Intermediate targets have been established and are presented in the GHG Emissions Reduction Pathway and GHG Emissions Reduction Plan (page 2).
5.4 GHG Emissions Management	Conformance	The Entity works systematically to achieve performance aligned to the GHG Emissions Reduction Plan and targets. It has implemented and maintains an Environmental Management System according to ISO 14001. Processes and controls to achieve performance aligned with the GHG Emissions Reduction Plan and targets are in place.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has quantified its Material emissions to air and data for the Drniš site are freely available in the Croatian E-PRTR register (Pollutant Release and Transfer Register), refer to: https://roo.azo.hr and the 2023 Sustainability Report: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf
6.2a-g Discharges to Water	Conformance	Wastewater at Drniš is treated mechanically, chemically and biologically and is then discharged into the public sewage system. At Einsiedeln, all wastewater is directly discharged into the public sewage system and then treated in publicly owned treatment works. Aluflexpack Group has made information on site-specific total water consumption publicly available in its 2023 Sustainability Report: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has a management program in place to prevent and detect spills and leakages. External communication is specified in the Entity's alarm and action plan. Emergency preparedness at the Drniš facility is addressed via the ISO 14001 certified management system. The Entity publicly reports any Spills in its Sustainability Report, refer to page 51: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	This Criterion is not applicable to the Entity as there have been no material Spills or leakages until the time of the Audit.

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	The Entity's strategy to support the circularity of its Products is publicly available at: https://www.aluflexpack.com/de/drive-circularity The Aluflexpack Group publicly reports on their generated Hazardous and Non-Hazardous Waste in the 2023 Sustainability Report, page 51: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf Data are stated at a site level. The Drniš Facility also reports waste data to the relevant authority annually and is publicly accessible at: http://roo.azo.hr
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	Aluflexpack Group has made information on site-specific total water consumption publicly available in its 2023 Sustainability Report on pages 17 and 51: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf An assessment of water-related risks in Watersheds in the Drniš site's Area of Influence did not identify any Material risks, especially as the consumed quantity is well below one percent of the total extracted quantity of the region. A wastewater treatment plant was under construction at the time of the Audit and is expected to start operations at the end of 2023. The Einsiedeln Facility only uses water for kitchen and sanitary purposes in a quantity not deemed Material. All water is supplied by the municipality and discharged into the public sewer system.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the sites consume only a very limited amount of water (Drniš: spring water, less than 7,000 m^3/year, Einsiedeln: Municipal water, less than 1000 m^3/year). Neither site is located in a water scarce area (refer to: https://www.wri.org/aqueduct).
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Einsiedeln Facility operates in a rented space (approximately 2,500 m^2) within a commercial building. There are no relevant risks identified and Materiality is considered as low. The site has no relevant outdoor area. Nevertheless, Biodiversity aspects have been considered as part of the Facility's environmental impact analysis. For the Drniš Facility, the Entity had undertaken a Biodiversity assessment performed by an external specialised consultant. The only relevant risk identified is the migration of neobiota.
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity, they have assessed the risks to Biodiversity and ecosystem Services in their Area of Influence.

CRITERION	RATING	COMMENT
and Impact Assessment – Priority		The assessment concluded that the Entity is not dependent on a specific Ecosystem Service and its impact on them is rated as low.
8.2a-g Biodiversity Management	Conformance	The Entity has established its Biodiversity Action Plan for the Drniš Facility. There is ongoing Consultation with external Stakeholders (e.g. Biodiversity consultant) on the management plans and controls. The Einsiedeln Facility operates in a rented space, there are no relevant risks identified and Materiality is considered to be low. The site has no relevant outdoor areas.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services assessment concluded that the Entity is not dependent on any Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has assessed the risk of Alien Species and established a procedure for the management of neobiota. Relevant persons at the Entity have been trained accordingly.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's management confirmed that Aluflexpack Group does not operate or plan to explore or develop New Projects in or close to World Heritage Properties. The culturally significant monastery in Einsiedeln is in the vicinity of the Einsiedeln plant (approximately one kilometre) but due to the small size and the nature of the Business, the plant has no Material impact on this heritage site.
8.6a-d Protected Areas	Conformance	The Entity has identified the presence of Protected Areas in its Area of Influence. Due to the small size of the Einsiedeln site, and the nature of the Business, the plant has no Material impact on Protected Areas. However, the Drniš site is in a Natura 2000 Birds directive site. An Impact Assessment confirmed that the 'day-to-day' operation has no Material negative impact. Emergency situations such as a Spill are addressed by an emergency plan, which is publicly available on the Croatian Government website.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	Aluflexpack has issued and communicated its Human Rights Policy document. The Policy can be accessed at: https://www.aluflexpack.com/wp-content/uploads/2023/11/Aluflexpack-Human-Rights-Policy.pdf The Entity has demonstrated its Human Rights Due Diligence process. Its assessment concluded that the Entity did neither cause, nor contribute to adverse Human Rights impacts.
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has developed a Policy for Diversity, Equity and Inclusion (DEI). This DEI Policy includes a plan for implementation. However, the Plan was not specific regarding responsibilities, resources and dates.

CRITERION	RATING	COMMENT
		During the Audit, no evidence of any deliberate Discrimination against women was identified. At the Group level, Aluflexpack publicly reports their progress in the percentage of women employed (refer to Sustainability Report 2023, pages 12 and 35 https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf).
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the sites are located in middle and south-eastern Europe, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the sites are located in middle and south-eastern Europe, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as the sites are located in middle and south-eastern Europe, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has identified the presence of sacred or cultural heritage sites within the Entity's Area of Influence. The culturally significant Einsiedeln monastery is in the vicinity of the Einsiedeln plant (approximately one kilometre away) but due to the small size and the nature of the Business, the plant has no Material impact on this heritage site.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as the sites are located in middle and south-eastern Europe, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no displacement is being considered or has occurred during the period since becoming an ASI Member, nor is expected to occur during this Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Human Rights Due Diligence has confirmed that there are no issues with Local Communities and therefore no need for actions to be developed. However, the Entity respects the legal and customary rights and interests of Local Communities. All relevant activities are subject to a permitting process and the Entity maintains adequate contact with community officials.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has demonstrated there are processes in place to ensure a risk-based Due Diligence over its Aluminium supply chain. Management regularly conducts documented risk assessments. The Entity aims to source Aluminium only from ASI Certified suppliers. At the time of the Audit, these either have been Certified or are working towards Certification. The Entity's direct suppliers are all located within Europe.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Aluflexpack has processes for assessing its supply chain which clearly define rules and the expectations for suppliers, Contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a process to respond to identified risks in their supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Audit against the ASI Performance Standard addresses the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	In its Sustainability Report 2022 (on pages 11, 36-37 and 40), the Entity has publicly reported on its supply chain Due Diligence process, available at: https://www.aluflexpack.com/news-and-media
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified, which was also confirmed by Worker interviews.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	As verified by document review and interviews, the Entity respects the rights of Workers to unite freely in unions, seek representation and join the Workers' council without interference. In Aluflexpack's Human Rights Policy (refer to: https://www.aluflexpack.com/newsmedia-mediaanddownloads) it is stated that "Aluflexpack Group reaffirms its commitment to the freedom of assembly and the right to Collective Bargaining for our staff, and does not discriminate against unions or union staff." At the Drniš site, a freely elected Worker representation is in place and a Collective Bargaining Agreement with the syndicates has been negotiated. At the Einsiedeln Facility, no formal Worker representation has yet been established.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the countries in which the Entity operates (Croatia and Switzerland), Applicable Law does neither restrict the right to Freedom of Association nor Collective Bargaining.
10.2a Child Labour	Conformance	The Entity does neither use nor support the use of Child Labour. In its Human Rights Policy (refer to:

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		https://www.aluflexpack.com/newsmedia-mediaanddownloads), Aluflexpack Group has stated: "Aluflexpack does not tolerate any form of Forced Labour or Child Labour, including modern forms of slavery and Human Trafficking. The Group holds the belief that every child must be protected against commercial exploitation, as well as any kind of work that is hazardous or may affect education, health, or personal custody of the child." The minimum working age of 15 years is respected and all Workers are adults (i.e. 18 years old or older). Interviews and document review confirmed the absence of minors and hence, the Entity is not engaging in any Child Labour.
10.3a-c Forced Labour	Conformance	As confirmed by the Entity's Human Rights assessment and further document review, site tours as well as worker and management interviews, the Entity does neither engage in, nor support the use of Forced Labour and Human Trafficking. In its Human Rights Policy, it is stated that Aluflexpack does not tolerate any form of Forced Labour. Aluflexpack has issued a Modern Slavery Statement at: https://www.aluflexpack.com/wp-content/uploads/2024/05/Aluflexpack-Modern-Slavery-Statement.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct and its Human Rights Policy document. Both documents can be accessed at: https://www.aluflexpack.com/newsmedia-mediaanddownloads Interviews and document review during the Audit did not indicate that the Entity would engage in, nor support Discrimination.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity ensures open communication and direct engagement with Workers. At the Einsiedeln site, a joint Health and Safety Committee is established and an anonymous letterbox for raising suggestions or concerns is available. Workers meet daily with their supervisors and managers to discuss work related issues. The Entity practices an 'open door' policy. At the Drniš Facility, Workers can address their concerns also via the Worker representation and their Union. Complaint resolution is specified in the documented 'work rules'.
10.6a-g Violence and Harassment	Conformance	In its Human Rights Policy, the Entity has stated: "We reject any form of violence, Harassment, abuse, or degrading treatment and promote a culture that values and recognizes the worth and rights of all individuals, as stated in our Group Code of Conduct." As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers. Workers are provided training and information regarding Violence and Harassment.
10.7a-c Remuneration	Conformance	The Entity respects the rights of its Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. At the Drniš site, Working Time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid are above the minimum wage and are in line with the national industry standards. Overtime is paid with a premium of at least 25%.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and local industry standards on Working Time, public holidays and paid annual leave. Working Time

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		is part of each employment contract and at the Drniš site regulated by the Collective Bargaining agreement. Due to the predominant shift work, Overtime is very limited.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and management during the Audit, the Entity's Workers are informed about Human and Labour Rights during the onboarding process and thereafter. All Workers receive documented training on fundamental documents such as the Code of Conduct and Human Rights Policy.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has issued an Occupational Health and Safety (OH&S) Policy and has implemented an OH&S Management System, as confirmed by interviews and document review. The Drniš Facility has successfully undergone external assessments (SMETA and ECOVADIS GOLD) and is certified against ISO 45001.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	A document review and interviews undertaken during the Audit confirmed that the Entity regularly reviews its OH&S Management System. In the 2023 Sustainability Report (page 30) the Entity has disclosed OH&S performance indicators (including the lost time incident rate and average training hours) at a Group level, refer to: https://www.aluflexpack.com/wp-content/uploads/2024/04/Sustainability_report_2023.pdf However, a comparative analysis of performance with peer businesses and leading practices has not been made publicly available.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has mechanisms in place to discuss OH&S issues with both management and Workers (e.g. joint Health and Safety Committee at the Drniš Facility and regular shift meetings at the Einsiedeln Facility).

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	27 April 2021	Initial Certification Audit – Provisional Certification
1	13 October 2021	Surveillance Audit – Full Certification
2	4 July 2022	Scope Change Audit to include the Einsiedeln facility (Switzerland). Certification Status changed to Provisional
3	14 June 2023	Surveillance Audit – Full Certification (re-instated Certification Period from Rev 1 of 13 October 2021 – 12 October 2024)
4	18 April 2024	Re-Certification Audit and Scope Change – Provisional Certification
5	17 January 2025	Revised design for Provisional certificates (page 1)
6	24 February 2025	Surveillance Audit – Full Certification