

ALVANCE is a registered trademark owned by Liberty Steel West Europe Ltd. Since 14 June 2022 our company is no longer part of the GFG Alliance and will no longer use the 'ALVANCE' name or trademark. Our new name is Aluminium Duffel BV.

SUSTAINABILITY REPORT 2020.

Towards Green Aluminium
ALVANCE Aluminium Duffel
www.alvancegroup.com



ALVANCE

Table of Contents

Welcome to our 2020 sustainability report	4
Letter from the Plant Manager	4
About this Report	5
About ALVANCE Duffel Aluminium BV	6
At a Glance.....	8
Sustainability at Alvance Aluminium Duffel BV	10
Our Priority Sustainability Topics.....	11
Engaging with our Stakeholders.....	13
Certifications and Industry Group Memberships.....	14
Our innovations for the future	14
Supporting our people	15
Safety and Wellbeing.....	16
Labour Rights.....	21
Fair and Inclusive Workplace.....	22
Employee Engagement and Development.....	22
Strengthening Community Relations	24
Protecting the environment	26
Circular Economy.....	27
Product Stewardship	29
Energy Usage	32
Reducing Greenhouse Gas Emissions	33
Waste Management.....	34
Managing Water Use Responsibly	35
Biodiversity.....	35
Behaving as a responsible business	37
Business Integrity and Ethics	38
Responsible Purchasing	38
Supplier Code of Conduct.....	39
Compliance	40

Glossary

ABS	Automotive Body Sheets
ASI	Aluminium Stewardship Initiative
CALP	Continuous Annealing Line with Pre-treatment
CN30	Carbon Neutral by 2030
EBO	Energy Policy Agreement (Energiebeleidsovereenkomst)
GWP	Global Warming Potential
LCA	Life Cycle Assessment
OEM	Original equipment manufacturer
RSI	Remelt Scrap Ingot



Welcome to our 2020 sustainability report

It is a great pleasure to present you with the 2020 sustainability report for ALVANCE Aluminium Duffel BV. Sustainability remains at the core of our business at ALVANCE Aluminium Duffel BV, and we continuously work to develop innovative solutions that will better position aluminium as the material of choice for customers and consumers seeking high-performance and sustainable products.

2020 was a challenging year. First of all, we were impacted by the COVID-19 pandemic, as was the entire industry. Through strict management of COVID-19 countermeasures in our plant and with the support of our employees, we managed to reduce the number of positive COVID-19 cases to a level significantly below the national average. We supported local healthcare facilities by providing much-needed materials and protective equipment.

We continued to serve our customers, including those who act as critical suppliers to our healthcare industry, and despite the many supply chain challenges brought about by the pandemic.

In 2020, we achieved ASI Chain of Custody (COC) certification. The ASI COC Standard sets out requirements for the creation of a Chain of Custody for COC Material, including ASI Aluminium, which is produced and processed through the value chain into diverse downstream sectors. For ALVANCE Aluminium Duffel BV, this ASI COC certification means that we are able to deliver semi-finished products for which we can guarantee that the ASI requirements have been met over the entire supply chain of originating these products.

We made significant progress in addressing our community concerns. The most tangible project was the erection of a sound barrier between our operations and our closest neighbours. This year, we have established and improved communication with our neighbours.

Building further on the bike-lease program for all employees launched in 2019, we installed new charging points and parking space for e-bikes. We are further extending electrification of our fleet of vehicles.

In October 2020, we transitioned ownership and became part of the ALVANCE Aluminium Group. This transition is a great support in our journey to reduce the carbon intensity of our products and activities since ALVANCE Aluminium Group has set the ambitious target to become carbon neutral by 2030 (CN30).

We remain focused to continuously improve our economic, environmental and social activities so that we can remain the preferred sustainable partner for all our stakeholders.

I hope you enjoy reading our 2020 sustainability report.

Kind regards,

Geert Vannuffelen

General Manager ALVANCE Aluminium Duffel BV



About this Report

The information in this report covers the sustainability activities of ALVANCE Aluminium Duffel BV for the 2020 financial year, which runs from 1 January to 31 December.

The report focuses on the sustainability topics of most importance to our business. It supplements data with examples and our forward-looking plans, as appropriate.

We plan to publish a sustainability report on an annual basis. We are aligning our sustainability reports in accordance to the GRI standard: Core.

CONTACT INFORMATION

We value feedback from our stakeholders regarding our sustainability performance and the content of this report. Please direct any comments, questions or concerns to:

info.duffel@alvancegroup.com

ALVANCE Aluminium Group

In October 2020, the Duffel manufacturing facility was acquired by ALVANCE Aluminium Group, one of the three core industry brands owned by GFG Alliance. GFG Alliance is a collection of global businesses and investments that operate independently of each other but are united by their shared strategy, values and purpose to create a sustainable future for industry and society.

The GFG Alliance's ALVANCE Aluminium Group, headquartered in Paris, brings together its assets across the global aluminium supply chain.

ALVANCE shares a commitment to GFG Alliance's carbon neutral by 2030 (CN30) initiative and aims to position itself as a champion of GREEN ALUMINIUM.

Our ALVANCE MISSION

Is to produce and sell aluminium to our customers by efficiently and sustainably operating integrated industrial assets.

Our ALVANCE VISION

Is to be by 2030 a leading sustainable and carbon-neutral global aluminium company serving our customers across the value chain.



About ALVANCE Aluminium Duffel BV

History of ALVANCE Aluminium Duffel

Founded as SIDAL

N.V. Société

Industrielle de
l'Aluminium) by
the family Feron

Hoogovens

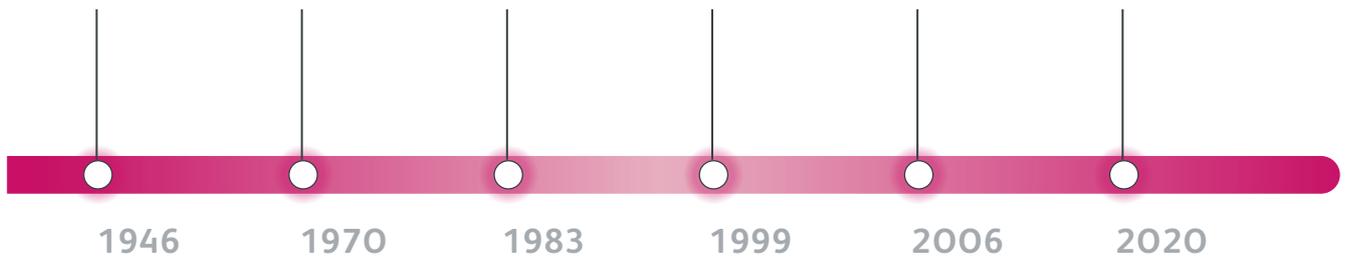
group partially
shareholder in
Sidal N.V.

Hoogovens
group full
owner

Corus
Group Plc.

Aleris
International
Inc.

ALVANCE
Aluminium
Group



Aluminium products production

ALVANCE Aluminium Duffel BV is a leading European producer of premium aluminium rolled products and a pioneer in the European Automotive Body Sheets (ABS) market. Located in Duffel, Belgium, our plant manufactures and sells aluminium rolled products for diverse industries worldwide. It features state-of-the-art technology, including the widest automotive cold rolling mill in Europe and a Continuous Annealing Line with Pre-Treatment (CALP). We source raw materials from aluminium smelters and convert them into rolled aluminium products for a variety of end-use industries, from highly designed cladding for building facades to automotive body sheet. ALVANCE Aluminium Duffel BV is constantly investing in innovative technologies, new production techniques and state-of-the-art production processes to drive innovation in materials, recyclability and process efficiency. The plant has the capacity to process 250,000 tons per annum and reuses in 2020 around 82,000 tons of aluminium scrap material. The reduction from 104,000 (2019) to 82,000 (2020) is mainly due to the COVID-19 pandemic.

Markets Served

% of tons of aluminium sold



Automotive

46%



Architecture & Design

19%



Distribution

8%



General Transportation

8%



Medical

3%



Other Industrial & Consumer

16%

Our guiding values and our number one priority



Safety

People's safety is our number one commitment and priority.



Family

We are more than a team, we are a family. The GFG Alliance has an inter-generational outlook, which means we make decisions for the welfare of future generations.



Change

Recognising that change is a constant in the world, we are dynamic in that we seek to drive change rather than let it drive us. We pride ourselves on having an open mindset and continually challenging the status quo.



Sustainability

As a family-owned group of businesses, we think of sustainability across three dimensions. Economically sustainable, socially sustainable and environmentally sustainable.

Performances 2020 at a Glance

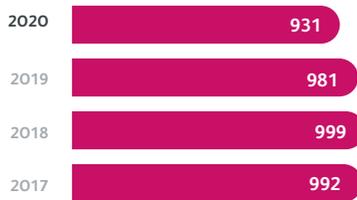
Our business

Employed
931 people

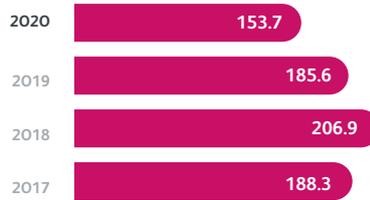
Produced
153,723 tons
of high-value aluminium rolled
products annually

Generated
€433 million
in revenue

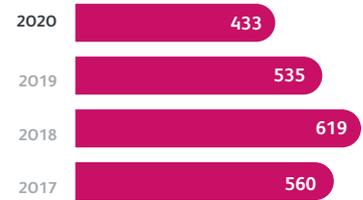
Total employees



Produced tons of high-value aluminium rolled products (kton)



Generated € in revenue (mEuro)



Our Sustainability Highlights



**ASI Performance Standard
ASI Chain of Custory**



Sourced **60%**
green electricity

86%  Duffel plant originated slabs in Ecolite product group made out of **86% scrap**



10,251 hours
of employee training

Our value chain



Bauxite Mining



Alumina Refining



Aluminium Smelting



Semi rolled products



Closed loop recycling scrap

Internal scrap

End Use Applications



Automotive

46%



Architecture & Design

19%



Distribution

8%



General Transportation

8%



Medical

3%



Other Industrial & Consumer

16%

Sustainability at ALVANCE Aluminium Duffel BV

At Alvance Aluminium Duffel BV, we are committed to producing aluminium with low carbon footprint and we are engaged to make our operations sustainable with respect to People-Planet-Profit. To achieve this goal, we work to continuously improve the sustainability of our operations and ensure the safety and well-being of our people.

We recognize that working in partnership with our customers offers great potential for positive impact. Almost everything we make is manufactured to specific customer requirements, including sustainability attributes.

In 2020 we agreed to start a sustainability roadmap for our Automotive products in 2021, as sustainability had become an important factor for our Automotive customers. Sustainability will also impact other industries, that is why we plan to develop more sustainability roadmaps for other industries in the coming years.

For our Automotive products we want to reduce the CO₂-footprint by 30% by 2025 (vs 2019), for GHG scope 1+2+3. Our overall CO₂ emissions, we want to reduce by 10% by 2025 (vs 2019) for GHG scope 1+2.

Our Priority Sustainability Topics

In 2020 we began the process of developing a materiality assessment to identify and prioritise our key sustainability topics. Several functional leaders were involved in this process, which gave us a better understanding of the environmental, social and economic issues driving sustainability at ALVANCE Aluminium Duffel BV.

We identified 15 topics, as presented in the table below. This enabled us to prioritise our actions on the most important issues. We have also used the results to inform the structure of this Sustainability Report.

Our assessment also included research on the topics considered material by peers and the wider industry, including those covered by the ASI Performance Standards and ASI Chain of Custody; as well as those covered by the Global Reporting Initiative (GRI) Standards for sustainability reporting.



Supporting our people

*ALVANCE is a family;
We take care of our own*

- Safety & Wellbeing
- Labour Rights
- Fair and Inclusive Workforce
- Employee Engagement & Development
- Community Relations



Protecting the environment

*We work to make the
future carbon neutral*

- Product Stewardship
- Circular Economy
- Energy Usage
- Reducing Greenhouse Gas (GHG) Emissions
- Waste Management
- Managing Water Use Responsibly
- Biodiversity



Ensuring we behave as a responsible business

*We set high standards of integrity
and standards, expecting the same
from our suppliers*

- Business Integrity and Ethics
- Responsible Purchasing
- Compliance

Case Study

Purchasing Low Carbon Primary Aluminium – Sourcing responsibly

Every aluminium product that leaves ALVANCE Aluminium Duffel BV is manufactured using primary aluminium, secondary aluminium (scrap) and alloying elements. The more pre- and post-consumer* scrap we use, the more economical and sustainable our product is, as we in turn need less primary aluminium. Whilst increasing our external scrap input is our first priority in Metal Sustainability, we also need to put a focus on the provenance of the primary aluminium.

In the life cycle of aluminium the extraction of aluminium by electrolysis consumes high amounts of energy. ALVANCE Aluminium Duffel BV focuses on using low-carbon primary aluminium by selecting primary aluminium suppliers who produce with renewable energy sources (e.g. hydropower). In 2020, 46% of the total bought volume of primary aluminium was delivered by suppliers who use low-carbon energy. Our goal is to increase the share of low-carbon primary aluminium in the following years.

*Pre-consumer material: Material diverted from the waste stream during a manufacturing process. Excluded is reutilisation of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.

*Post-consumer material: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.



Engaging with our Stakeholders

At ALVANCE Aluminium Duffel BV, we recognise that engaging with our stakeholders is essential to ensuring business success and achieving our sustainability aims. Encouraging two-way communication with our stakeholders helps us to keep abreast of sustainability opportunities, risks and emerging trends. Through formal and informal business channels, we regularly engage with key stakeholders including customers, suppliers, industry organisations and government. The table below outlines our key stakeholder groups.

Sector	What ALVANCE Provides
Customers	We hold regular technical seminars for key customers, allowing us to share product innovations while gathering insights on how to further improve our product offerings.
Employees	Sensitive to constraints related to the COVID-19 pandemic, we hold regular meetings in smaller teams and through Teams where the management team provides feedback on important topics and answers questions in real time. We also hold monthly consultations with employee organisations and unions.
Unions	During the monthly safety and health committee and works council meetings, union and employer representatives discuss a variety of topics.
Suppliers	We work closely with our suppliers and subcontractors, encouraging them to uphold our high standards on health, safety and the environment.
Industry Groups	We engage with national and European industry groups and participate in dedicated sustainability and decarbonisation projects to share best practices and learn how our peers are approaching common sustainability concerns.
Local Communities	We work to build a positive presence in the communities we serve, informing our neighbours and local authorities about the results of initiatives taken and upcoming sustainability projects.
Research Institutions	We collaborate with research institutions and universities to get a better understanding on how the aluminium rolled product supply chain and breakthrough technology through products and processes can contribute to the sustainability transition.

Certifications and Industry Group Memberships

To maintain sustainability standards and stay engaged with our industry peers and other stakeholders, we have obtained a number of certifications and we engage with a select number of industry associations and membership organisations.

Association	Our Involvement
Aluminium Stewardship Initiative (ASI)	Since 2019, we are certified for ASI, Aluminium Stewardship Initiative, Performance Standard. In 2020, we received the certificate ASI Chain of Custody. The ASI Performance Standard defines environmental, social and governance principles and criteria, with the aim to address sustainability issues in the aluminium value chain. The ASI Chain of Custody (COC) Standard complements the ASI Performance Standard and is voluntary for ASI members. The COC standard sets out requirements for the creation of a Chain of Custody for COC material, including ASI Aluminium, which is produced and processed through the value chain into diverse downstream sectors
ISO 14001	Our operation is certified to the ISO 14001:2015 standard, which sets the criteria for an environmental management system.
The Materials Industries Group of Agoria	We are member of this federation of technology-inspired companies based in Belgium.
European Aluminium (EA)	As a member of the European Aluminium's Rolling, Extrusion, Casting and Foundries Group, we work collaboratively with different stakeholders on recycling and sustainability topics. Under the Innovation Hub "umbrella", several precompetitive taskforces have been launched on sustainability topics, for instance to decarbonise the supply chain.
Flanders Metals Valley	We will join this regional consortium of metal processing companies in Flanders and Flemish Universities teaching metallurgy and metals processing programs to find synergies and exchange sustainability and decarbonisation ideas and initiatives.

Our innovations for the future

Customers are repeatedly seeking more sustainable products: products with a higher recycled content, light-weighted components and materials to improve end-of-life recycling.

In order to provide our customers with their desired materials, ALVANCE Aluminium Duffel BV has two innovation centres, one located in Duffel and one in Aachen (Germany). The innovation centres focus on developing high-performance, sustainable solutions for our customers as well as for improving our own processes within ALVANCE Aluminium Duffel BV. The R&D team engineers new materials to meet customers' requirements and become their supplier of choice.

Examples of recent initiatives include:

- A highly formable inner body sheet that provides greater design freedom due to improved formability and allows further lightness of car bodies by transitioning from steel parts to aluminium parts
- Development of a high strength crash absorbing aluminium alloy, as an alternative for heavier steel crash components
- Development of a single future generation alloy that has the ability to replace multiple existing alloys and substantially improves the scrap re-utilisation in closed loop programs

Supporting our People

Our people are fundamental to the success of our business. ALVANCE Aluminium Duffel BV employed 931 people by the end of 2020 and we are committed to fostering a positive and COVID-19-safe workplace environment that rewards employee development, collaboration and flexibility. We rely on our highly talented workforce to bring their ingenuity, resourcefulness and a shared passion for innovation to help us create the next generation of aluminium products.

Safety and Wellbeing

At ALVANCE Aluminium Duffel BV, safety is the most important of our core values. We recognise that the nature of our industry's materials and machinery means there are safety risks inherent to our operations. Our main risks present on site are molten metal, mobile equipment and lifting loads, machinery and chemicals. To mitigate against these, we prioritise safety excellence at every level of the

Managing Safety and Wellbeing

Health and safety is managed across the organisation by a dedicated Health, Safety and Environment (HSE) team. This team coordinates the development and implementation of policies and procedures in line with the International Labour Organization (ILO) conventions on Occupational Safety and Health. They facilitate the implementation of the Global Prevention Plan, an annual action plan (safety excellence plan) and systematic workplace observation. They also conduct regular workshops and safety trainings, safety checks and structured analyses in the workplace, as well as surveys to measure safety culture.

ALVANCE Aluminium Duffel BV also has an objective to prevent work-related diseases and promote employee health, advancing a culture that ensures health inside and outside of our premises.

We have an internal occupational health department that is responsible for providing employees with medical advice. This team's duties include carrying out a medical examination on every new employee, annual preventative medical examinations for production workers, ad hoc medical examinations at employee request, and regular workshops and safety trainings. All consultations are treated confidentially.

The GFG Alliance also established in 2020 'GFG Life Savers' through which employees can intervene, report and discuss human errors to learn from while simultaneously developing an interdependent safety culture. These GFG Life Savers include:

- Confined space
- Electrical safety
- Isolation LOTOv (Lockout Tagout & Verification)
- Lifting operations
- Machine Safety
- Mobility equipment
- Molten metal
- Transport safety
- Working at height

During the monthly safety meetings, more information for each GFG Life Saver was given to all employees of ALVANCE Aluminium Duffel BV.

company. Looking after the health and wellbeing of our employees contributes to the delivery of quality work and the engagement of the whole team in achieving our common goal of 0 accidents by 2025. We also recognise that the good health of our employees contributes to the overall morale of our workforce.

In 2020, in order to keep all employees healthy, we took the necessary actions to prevent people from being infected with COVID-19. We introduced telework, separated entrances and exits of the plant, introduced one-way traffic, disinfection procedures, limited the number of people allowed in rooms, installed a 24/7 corona-hotline, among other measures, which had impact on our COVID-19 infection rate, which was significantly lower than the national average.

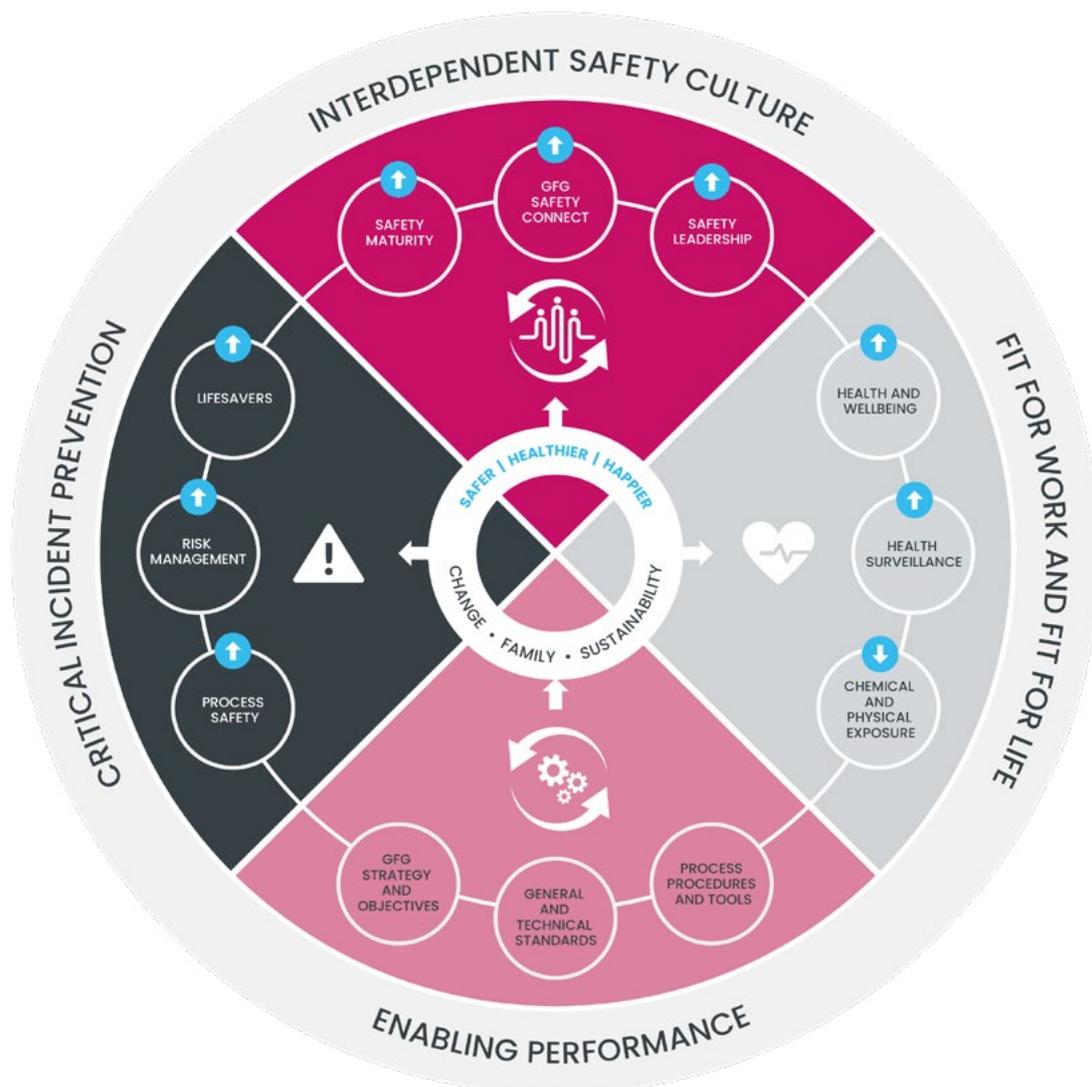
Every department completed their yearly health & safety action plan which included actions regarding risk analysis, machine safety, molten metal, industrial hygiene, ergonomics and training.

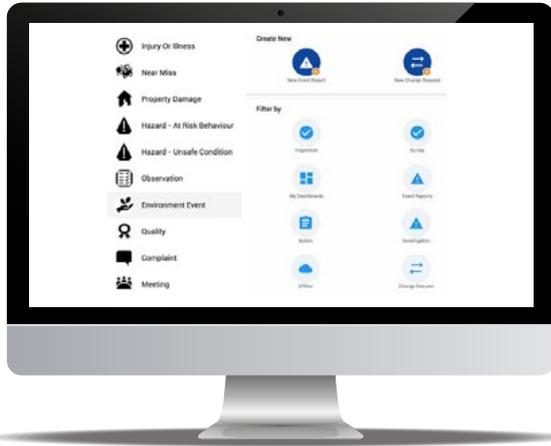
One specific action we would like to highlight is the renewal of the last foundry station on our site that was still operated manually. Thanks to this renovation, all of our foundries are now hands-free operated. As a result, no operator needs to be near the casting during the initial and final stages of the casting process. These phases statistically give the highest risk of metal explosions. Due to the COVID-19 pandemic, we organised several trainings about ergonomics for remote working and launched an awareness campaign around the right to disconnect and how to maintain a healthy work-life balance.

Safety and Wellbeing Performance

In 2020, our safety excellence plan 2021 (annual plan on safety) was developed in cooperation with the employees of the different departments. Through this plan, we want to reinforce employees participation and consultation in our safety programs. Every department is now working on its own safety excellence plan, leading to a higher commitment for safety and a higher engagement of people working on the shopfloor.

In 2020 we also started with the implementation of the GFG safety programs. The GFG safe way is becoming our roadmap to safety excellence. The overall conduct of GFG businesses is guided by the “Be GFG Safe” vision, along with the GFG mission, policy and values. “Be GFG Safe” is a global rallying cry for everyone to look out for each other, because we want our people to be safe, always. The tools and programs include the “GFG Life Savers”, standards, and health and safety assurance program.

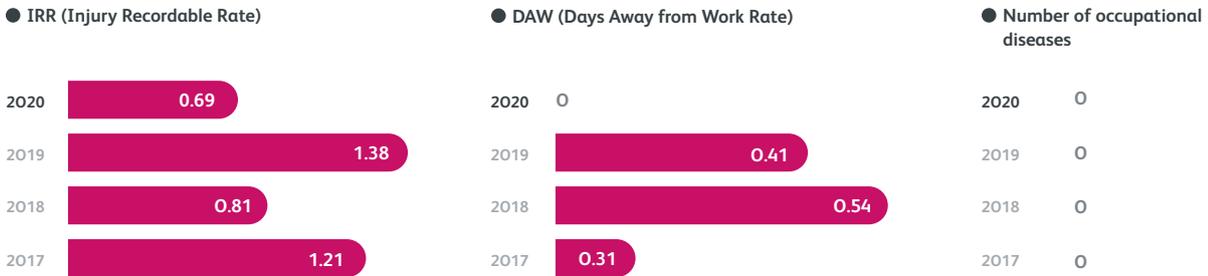




During 2020 we introduced the software Cority for a better follow-up on our safety and environmental performances. With this tool, ALVANCE Aluminium Duffel BV improves the reporting of safety and environmental incidents, unsafe conditions & behaviour, safety observations and provides a system to follow-up on preventive and corrective actions.



1. Health & Safety Performance

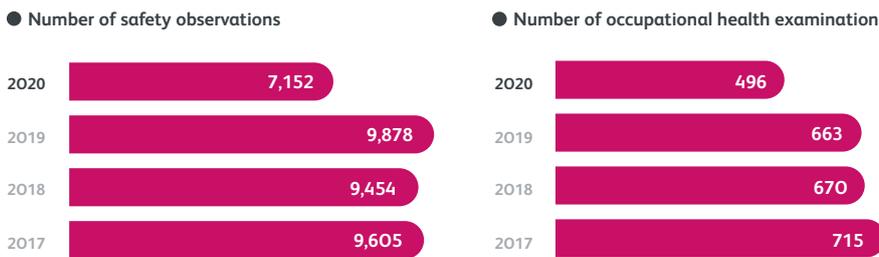


In 2020, ALVANCE Aluminium Duffel BV achieved the record of 200 days of work without a work-related accident. We measure our health & safety performance through indicators.

- IRR (Injury Recordable Rate) = Amount of recordable injuries x 200,000 / amount of working hours employees
 - o Target 2020: max. 0.70
- DAW (Days Away from Work Rate) = Amount of occupational accidents x 200,000 / amount of working hours employees
 - o Target 2020: max. 0.25

A recordable injury can be a medical treated injury, an injury that results in a work adjustment or an injury that prevents the employee from coming to work.

2. Preventive performance indicators



Due to the COVID-19 pandemic in 2020 and the introduction of several actions to prevent our employees from getting infected with COVID-19 (teleworking, social distancing, virtual meetings, etc.) we saw a decline in the number of workplace safety observations and occupational health examinations. During workplace safety observations, one or two employees observe their colleagues from their own or other departments on safe behaviour while performing their tasks, followed by a short conversation with the persons involved. By conducting these observations, we expect an increase in the safety awareness of our employees.

Case Study

Protecting our employees from the COVID-19 pandemic and helping hospitals and elderly homes by donating FFP2 face masks.

In 2020, our attention was completely absorbed by the COVID-19 pandemic. To protect our employees against COVID-19, various measures have been taken such as distance rules, face masks, rules regarding maximum occupation in premises and operating rooms, rules regarding hand hygiene, introduction of antibacterial hand gels, teleworking where possible, etc. These measures were supported by numerous awareness campaigns. Our medical department ensured that contact tracing, in case of contamination, was guaranteed.

In March and April 2020, hospitals and residential care centres were confronted with a significant shortage of face masks and protective clothing. We had a limited stock of these critical personal protective equipment, which we used during maintenance activities. The ALVANCE Duffel management team decided that the general interest prevailed on our own interest and this resulted in the donation of face masks and protective clothing to the hospital of Lier, the residential care centre Sint Elisabeth in Duffel and the retirement home Huize Nazareth in Lier. With this action, we contributed to help protect the most vulnerable people against COVID-19.



Labour Rights

At ALVANCE Aluminium Duffel BV, we recognise that respect for human and labour rights is fundamental. Strong performance on ethics and integrity are inextricably tied to our corporate reputation and, ultimately, our business success.

ALVANCE Aluminium Duffel BV complies with all required laws with respect to human rights, including mandatory laws relating to internationally proclaimed human rights, conflict minerals, child labour, collective bargaining rights, and forced

and compulsory labour. We do not tolerate discrimination against any employee or prospective employee on the basis of race, sex, colour, national origin, gender identity or any other legally protected status. There is no place for disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind in our plant - harassment is not allowed at the plant or in any work-related circumstances outside the plant.

Ensuring Employee Representation

ALVANCE Aluminium Duffel BV recognises and respects our employee's right to free association and their right to join, form or not join a labour union without fearing reprisal, intimidation or harassment. When employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely elected representatives. We promote open and honest communication with union representatives.

Our employees are represented by three major unions: ACV (Algemeen Christelijk Vakverbond – General Christian Trade Union), ABVV (Algemeen Belgisch Vakverbond – General Belgian Trade Union) and ACLVB (Algemene Centrale van Liberale Vakbonden van België – General Liberal Trade Union). Employees vote for new union representatives through social elections every four years.

Employer representatives meet with union representatives on a monthly basis through the Work Council, the CPBW (Committee for the Prevention and Protection at Work) and in union delegates meetings. In these meetings, we collaboratively seek solutions for important issues. Our discussions relate to the following topics: company-wide issues, production and work scheme changes and investments, disciplinary actions, working hours and rewarding systems. We are proud to say that to date, this process has successfully mitigated any potential risk of worker strikes.

In 2020 we did not have to lay-off employees during the COVID-19 pandemic. We instead decided, after open dialogue with our union representatives, to use temporary unemployment for all employees.

Fair and Inclusive Workplace

We recognise the need to promote diversity in the workplace and foster a company culture that ensures everyone, regardless of race, sex, colour, national origin, gender identity or any other legally protected status feels included.

The ALVANCE Aluminium Duffel BV management team includes 78 % of men (two women and seven men), to compare with 91 % of men in our total workforce and where the majority of our employees work in the manufacturing facility. The share of women in the total workforce did not increase since 2019. When approaching schools to present our company, this is being done without difference in gender.

Due to a hiring freeze in 2020 (since end 2019), leavers were not replaced, which explains the decline in workforce in 2020.

To support our employees when they experience stress, discrimination, conflicts or other unacceptable behaviour, we have dedicated employees who work as counsellors and are trained to handle potential discrimination and conflicts between different parties at work with complete discretion. Additionally, the 'I am Here' programme was introduced in order to keep develop ambassadors inhouse who reach out to colleagues when they sense they are not feeling ok. They will listen and if needed refer the colleague to those who can help. The slogan to the programme is: "It is ok, to not feel ok!".

Total Employees



Gender Diversity (%)

○ Men ● Woman



Employee Engagement and Development

We strive to create a culture where every employee feels motivated to deliver excellent work. We believe this is central to the ongoing operations of our company because it allows us to attract and retain an exceptional workforce.

We support our employees by offering competitive salaries and benefits and providing challenging opportunities for professional growth and development. We are committed to helping every employee meet his or her personal and professional goals and strive to provide opportunities for the meaningful exchange of ideas and feedback. It is our hope that every employee who starts a career with ALVANCE

Aluminium Duffel BV finds the opportunity for advancement, leading to a long-term and fulfilling career. The prove of this long-term and fulfilling career can be seen in our absenteeism and turnover rates, which are, for 2020, lower than industry average.

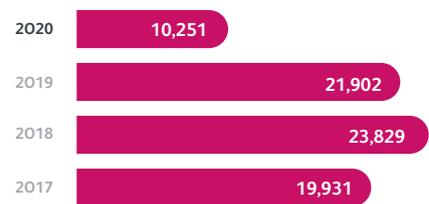
A great example of the engagement of our employees is the 'Business Excellence Award' we received in 2020. The Business Excellence Award is a Flemish initiative that provides an award to a company which has demonstrated continuous improvement on quality. ALVANCE Aluminium Duffel BV achieved this award through employee engagement.

Training and Development

As customers seek increasingly sophisticated technological solutions, our employees must be up-to-date with the latest technologies and methodology. We organise on-the-job Lean-Six Sigma trainings for all our employees: white belt, yellow belt, green belt and black belt. In the maintenance department, we have trained a number of reliability engineers. These engineers apply scientific know-how to a component, product or process in order to ensure that it performs its intended function, without failure, for the required time duration in a specific environment.

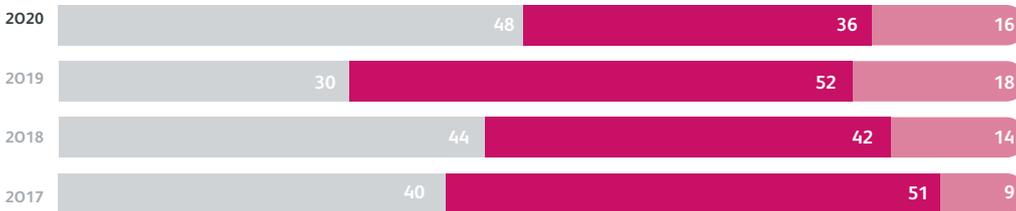
Twice a year, we run a networking event for white-collar employees called 'Market Place', during which multiple topics related to the company's strategy are discussed. In times of COVID-19, where physical attendance was restricted, we did manage to deliver online trainings and workshops, for example Kaizens (productivity improvement group activities) and embedding workshops around Cultural Transformation (programme developed to increase employee ownership and improve servant leadership to reach the desired culture).

Total training hours/year



Training hours/year (%)

● Safety ● Job training ● Human behaviour (Transformation, Lean, other)



To ensure the whole workforce remains engaged and up-to-date on the latest safety (and other) matters, the plant manager organised two Town hall Meetings in 2020, both digitally and/or in smaller face to face groups. During these meetings, employees have been updated about the financial performance of the business and any challenges that ALVANCE Aluminium Duffel BV may be experiencing. Employees are encouraged to actively participate and ask questions during these sessions. In addition, four times a year every employee is invited to an informal session with subject matter experts to discuss a particular topic. This can be a particular project within ALVANCE Aluminium Duffel BV or an initiative taken by some employees. A particular growth project that is in preparation and therefore discussed on a regular basis is the installation of a new scalper.

Attracting Young Talent

Our workforce is getting older year after year. The average age of our employees is currently 48 years. In order to cope with our employees getting older and to ensure that they can continue to perform their duties, we started working on a plan for elderly employees.

Next to this, we are investing in a better relationship and more contacts with technical schools to improve our pipeline of young talent. We have started an apprentice program and a project on “dual leren” or “dual learning”, where students can combine work with learning.

We adhere strictly to the Belgian legislation on the employment of youthful workers. Although youth can work at ALVANCE Aluminium Duffel BV from 15 years of age, they can only work in non-hazardous, administrative roles, and under the supervision of a team leader. We prohibit the hiring of individuals under 18 years of age for positions in which hazardous work is required.

Strengthening Community Relations

We believe that being a responsible corporate citizen extends, beyond our operations, to the communities where we operate. We are committed to being a responsible and engaged community member and are working to build a positive presence in the communities we serve. In order to give strength to this belief, we appointed in 2020 a project leader to engage with the local community.

Addressing Community Concerns

Our plant is located near a residential area and as such, we believe it is our civil responsibility to contribute to the wellbeing and prosperity of the local communities that our employees and neighbours call home. We take precautions to ensure our facilities function safely and minimise impact on our neighbours and the environment.

When issues arise, we work cooperatively with neighbours and community members to assess concerns and potential solutions. Neighbours can reach us 24 hours a day via telephone **+32 15 30 22 22** or via **info.duffel@alvancegroup.com**, if they have complaints about any environmental or social issue originating from the plant. All complaints are thoroughly investigated and if appropriate, corrective measures are taken.

Engaging with the Community

To keep the neighbours and local authorities informed on the results of taken actions and upcoming new projects, a newsletter is provided on a regular basis. Furthermore, a new neighbour consultation has been carried out in September 2020. Because of COVID-19 we opted to have multiple sessions with less participants. Over 300 families from the neighbouring area received an invitation to participate in this

consultation. In total 6 sessions took place and 23 neighbours participated together with representatives of the community of Duffel and the environmental inspection agency. Topics like noise, odour and biodiversity were handled in these sessions, as well as questions from the neighbours. In 2021 another neighbour consultation will be organised.



On 20 September 2020 ALVANCE Aluminium Duffel BV has installed a sound wall that blocks the noise coming from our cast house and the storage area for slabs. The sound wall is 273 meters long and has a height between 5 and 7 meters.

Due to an increase in odour complaints by our neighbours in 2020, ALVANCE Aluminium Duffel BV started investigating on this odour problem. We could link the odour to the products we use in our rolling processes and are working on satisfying solutions for our neighbours, which will be implemented in 2021.

Our Forward Looking Plans



Safety and Wellbeing

- To continuously revise and improve our safety management system, with the goal to achieve our Zero Accident Vision.
- To achieve certification against ISO 45001:2018 by the end of 2021.



Employee Engagement and Development

- To continue to excel in cooperation with unions for the benefit of our employees and the continuity of the company.



Strengthening Community Relations

- To continue to facilitate a constructive dialogue with our communities, investing in new technologies to reduce emissions and noise. A new consultation with our neighbours, municipal officials and the Environment Department is planned for late 2020.
- To reach an effective solution for the odour problems by adding an odour masking agent in the rolling emulsion.

Protecting the Environment

We are committed to producing GREEN ALUMINIUM, both by collaborating with customers to enhance the sustainable features of our products and by minimising the environmental footprint of our operations.

Aluminium is in many ways an inherently sustainable material.

It is versatile, lightweight, and can be recycled infinitely, all while preserving its unique properties. Moreover, aluminium products made with recycled content require 95 % less energy than products made with primary aluminium.

In collaboration with our customers, we take full advantage of these unique properties to reduce the CO₂ footprint of our products and help drive a more circular value chain, minimising waste where possible.

Meanwhile in our direct operations, we implement an effective environmental management system that minimises our environmental footprint by reducing greenhouse gas emissions, improving energy efficiency, reducing water use, and preventing pollution.

Our work on GREEN ALUMINIUM with our customers can be split into two main areas:



Making strides towards carbon neutrality: We supply aluminium body sheets according to Aluminium Stewardship Initiative (ASI) standards, with a minimised CO₂ footprint. Aluminium is lightweight, strong, non-corroding and easily formable into a wide range of products. By enabling significant weight reductions across solutions in multiple sectors, aluminium can make a major contribution to the reduction of carbon emissions.



Partnering to create a more circular economy: Recycling aluminium into new products only requires 5% of the energy needed to melt it from its ore – and this opens opportunities for further energy savings across sectors. We strive to set the benchmark in the industry for strategic partnerships that take an interdisciplinary approach to reduce, reuse and recycle approaches.

Circular Economy

Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to design waste out of the system, decoupling economic activity from the consumption of finite resources.

Across the value chain, our greatest opportunity for contributing to a circular economy and reducing our environmental impact is by maximising the content of scrap in our products.

This directly reduces the amount of primary aluminium needed and decreases energy use and waste.

Requiring just 5% of the energy used to produce primary aluminium and with only 5% of the associated greenhouse gases, recycling results in greater carbon reduction and a safer environment.

Closed-loop recycling

For many years, we have collaborated with our suppliers and customers to identify new sources of aluminium scrap and innovative ways to reuse aluminium and keep it in the system for longer. Our scrap metal includes material bought from traders and distributors, as well as scrap returned from customer operations. As we set the use of more pre- and post-consumer scrap as our first priority in reducing our carbon emissions through the life cycle of our aluminium products, we decided in 2020 to appoint a new hire in R&D in 2021. This new hire will enhance internal expertise on how to recycle mixed alloys.

Contributing to a circular economy through closed-loop recycling



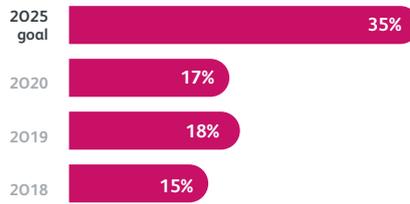
Many of our customers further process our semi-finished products into finished products, creating scrap along the way. Instead of selling this high quality scrap on the open market, ALVANCE Aluminium Duffel BV partners with a number of customers to take their scrap back and recycle it into a new product for the same customer. This closed-loop process maintains the integrity of the product, reduces energy and material costs and use, and decreases customer waste streams. We also recycle scrap from our own rolling processes to minimise use of raw materials.

We are continuously working to increase the amount of scrap we use in our operations and as a result, the recycled content of our products. By 2025 we want to increase our customer input scrap rate to 35% and want to improve our metal yield by 5%. As a consequence, we will reduce our internal process scrap. Unfortunately, in 2020, the customer input scrap rate dropped with 1% due to COVID-19 closures at our closed-loop customers. At the same time, our RSI (Remelt Scrap Ingot) from dross, which represents our re-using the most difficult scrap generated in our cast house process, reduced from 0.6% to 0.5% in 2020 due to the mix produced in our cast house, driven by COVID-19 expectancies.

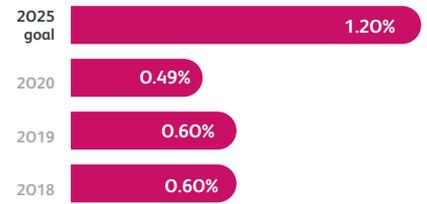
Recycling % content final product



Customer scrap



RSI from dross



* including 5% metal yield improvement

Case Study

‘Transitions and behaviour in the European Rolled Products Aluminium Supply Chain’

ALVANCE Aluminium Duffel BV is a major partner in the Dutch NWO funded research project “Understanding and leveraging B2B behaviour for improved supply chain sustainability” along with Damco and European Aluminium. This project is led by the Vrije Universiteit Amsterdam. The goal of this research project is to identify inhibitors and motivators for European aluminium rolled product supply chain to reduce its carbon footprint over the entire product life cycle. Prof. Dr. Wout Dullaert, head of the Supply Chain Logistics department of the School of Business and Economics at the Vrije Universiteit Amsterdam: “This project provides insights on the dynamic behaviour of the aluminium supply chain for the coming decades. With the help of our consortium partners, we have developed a system dynamics model that reveals the future dynamics between demand, supply, legislation and emerging technological changes. Moreover, we are currently working on identifying the most promising sustainable business models for the metal sector that reveals the preferred pathways of supply chain players to make their business sustainable”.



Product Stewardship

We take the entire life cycle of our products into account - including design, production, packaging, transport, use and end-of-life - when considering our products' environmental impacts.

We keep the customer in mind throughout this process, collaborating to understand the unique challenges they face and developing personalised strategies to address these. Increasingly, our customers are looking to enhance the sustainability attributes of their products and/or impose specific environmental requirements.

To meet these evolving customer demands, ALVANCE Aluminium Duffel BV is constantly investing in innovative technologies, new production techniques and state-of-the-art production processes. This drives continuous innovation in materials, recyclability and process efficiency.

The sustainability impact of our products

	Sector	What ALVANCE Provides	Sustainability Impact
	Automotive	<p>Applications include engine housings, car bodies, anti-lock braking systems, shock absorbers and heat exchangers.</p> <p>In 2020, particular focus was put on a highly formable inner body sheet that provides greater design freedom due to improved formability and allows further lightness of car bodies by transitioning from steel parts to aluminium parts.</p>	<p>Aluminium provides a lighter-weight, more fuel-efficient alternative to steel when used in automobile manufacturing, with lighter cars producing fewer emissions in the end-use phase.</p> <p>Aluminium is also infinitely recyclable, meaning we are able to recycle waste scrap through closed-loop operations and so keeping its properties. At this moment, our closed-loop recycling scheme is mainly focused on the automotive industry.</p>
	Architecture & Design	<p>Aluminium sheets for building products offer heat and sound insulation, resistance to corrosion and weathering, and a high strength-to-weight ratio.</p> <p>ALVANCE Aluminium Duffel BV has developed a premium alloy: 55HX®. This alloy – which offers guaranteed colour and gloss uniformity and a unique look – is a state-of-the-art material for architectural applications, best used for exterior façades, roofs, balconies, sun ventilation screens and interior ceilings, pillars, or wall cladding and escalator casing.</p>	Our products for building and construction provide builders with sustainable products that have over 90 % recycled content.
	Medical Equipment	Aluminium narrow coil and sheet offering a deep-drawing quality for inhalers and durable, corrosion-resistant products for hospital equipment.	Recyclability of products leads to lower waste. End-users have enhanced quality of life.
	Commercial Transportation	Large-sheet and coated aluminium products used in the construction of trucks, trailers, buses, recreational vehicles, rail cars, ships and boats.	Lightweight vehicles made out of aluminium require less energy to travel, which reduces overall fuel costs and associated GHG emissions.
	Other industrial & Consumer markets	Multi-layer tubing; transformer windings; electrical cables for white goods and travel ware.	Lightweight product that reduces energy use and GHG emissions. Recyclability of products leads to lower waste.

Understanding our Environmental Impacts through Lifecycle Assessments (LCA)

A life cycle assessment, or LCA, is a technique to assess the environmental impacts of a given product throughout its life, from raw material extraction through to its end-of-life. This is a vital tool for mapping the upstream impacts and downstream benefits of our products, helping to identify where environmental improvements can be made at various stages of the product’s life cycle.

We have been undertaking LCAs on our Automotive products since 2012, starting with our Superlite® 200 for exterior Automotive body parts and Ecolite for interior Automotive body parts and structures. Since 2017 we also have LCAs on our Non-Automotive products.

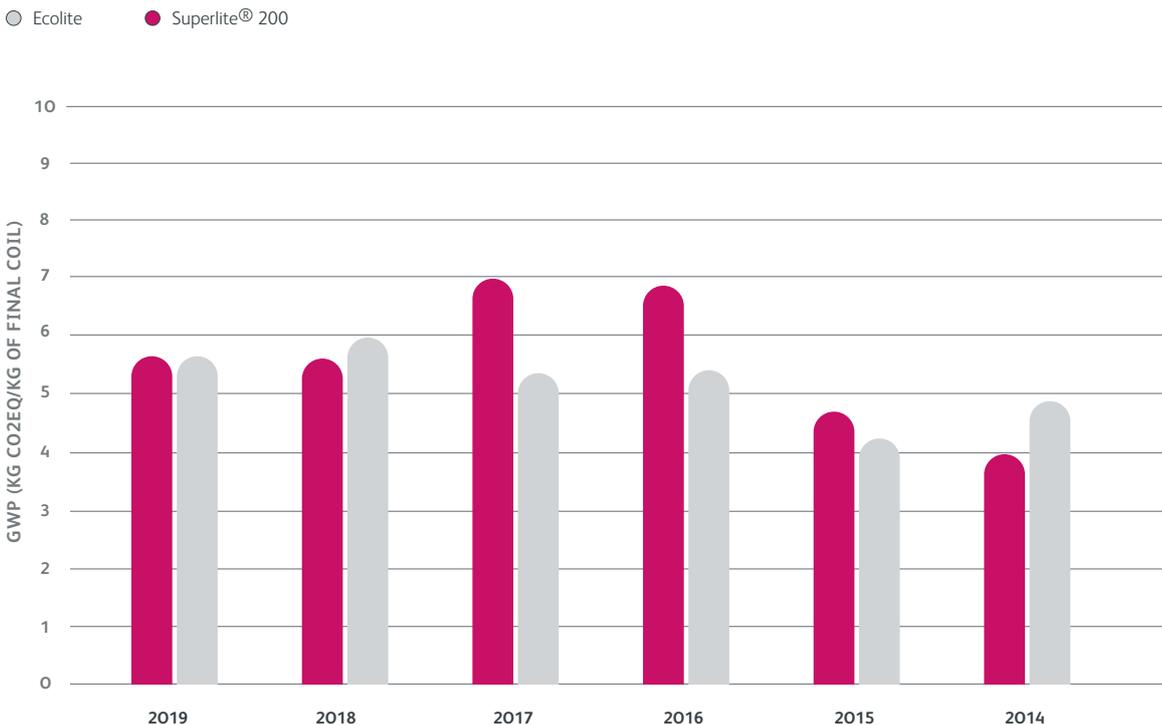
We continue to use LCA as a tool to monitor our CO2 footprint and to define the key areas for improvement.

Automotive LCA results

The results of our Automotive product LCAs show a year-on-year improvement in the reduction of the associated Global Warming Potential (GWP). This has been achieved through the following actions:

- The use of secondary raw material, including pre- and post-consumer scrap and assuring its use by means of closed-loop partnerships with our customers.
- Optimisation of the manufacturing process of our products, for example through insourcing the cold rolling of wide automotive body sheet.
- Quality improvements resulting in fewer rejects, less rework and reallocation and thus resulting in fewer waste products that need to be reproduced.
- The use of energy from renewable sources for the production process in Duffel. This had a positive effect on all the processes in the Duffel routing.
- Actions and investments to consume less energy or to reduce energy losses, e.g. the heat recuperation at the CALP (= Continuous Annealing Line with Pre-treatment) line.

Evolution of GWP for Ecolite and Superlite® 200

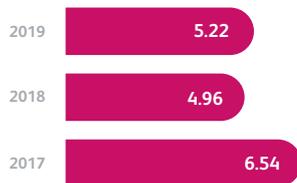


Non-automotive LCA results

In 2020, ALVANCE Aluminium Duffel BV published a new LCA report for the Non-Automotive products with GWP results for 2018 and 2019. For 2018, the result was a GWP of 4.96 kg CO₂eq/kg of final coil for the average Non-Automotive and for 2019 the result was a GWP of 5.22 kg CO₂eq/kg of final coil for the average Non-Automotive.

GWP (kg CO₂ eq/kg of final coil)

Non-Automotive



Energy Usage

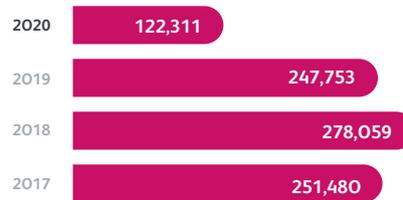
Our manufacturing facility requires large amounts of energy to melt, cast, roll and recycle aluminium. At ALVANCE Aluminium Duffel BV, we rely on both natural gas and electricity for our energy needs. More than 300 gas and electricity counters enables a good follow-up of the energy consumption per sub-process and per installation.

Electricity and gas are available via a public network and all other energy sources are bought from external suppliers and transported to the plant. Diesel is used for our internal transportation by forklifts and heating of one specific building.

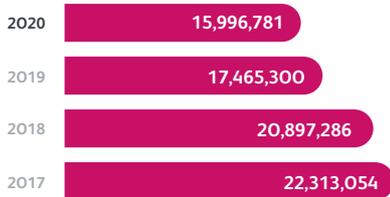
Electricity from non-renewable resources (MWH)



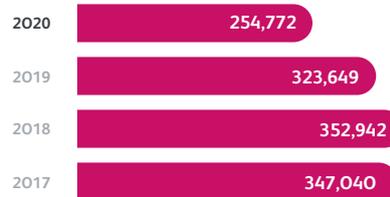
Electricity from renewable resources (MWH)



Natural gas (Nm³)



Diesel (l)



For our electricity consumption, we have been purchasing certificates of origin since 2015. A certificate of origin provides information to electricity customers on the source of their energy. These certificates of origin are the only precisely defined instruments evidencing the origin of electricity generated from renewable energy sources.

Due to cost constraints in 2020, we only bought certificates of origin to cover the Automotive product productions, so we only covered 60% of energy usage. In 2021 we commit to going back to 100% electricity with certificates of origin.

Other actions ALVANCE Aluminium Duffel BV performed in 2020 include replacing high energy consuming lights by LED lighting in the cast house, replacing several diesel forklift trucks by electric ones, ALVANCE Process Control Project Cast house 7 (project to control and optimise productivity of cast house 7), renewing insulation of one of the preheating oven and improving the metal yield by optimisation the scrap protocol, among other actions. All these actions contributed to decrease our energy consumption and CO2 emissions.

Improving energy efficiency is at the heart of our efforts to limit our carbon footprint. Due to the large amount of natural gas used for heating, our preheating furnaces produce the highest CO2 emissions. Our sustainability roadmap towards CN30 thus includes the exploration of the transition from natural gas to sustainable produced hydrogen or less carbon intensive fuels for our furnaces.

Reducing Greenhouse Gas Emissions

Energy-intensive branches of industrial companies can join the Flemish government's voluntary energy policy agreements (EBOs). These EBOs aim at anchoring the Flemish industry and permanently improving its energy efficiency. They play a significant role in the Flemish and European energy efficiency objectives. ALVANCE Aluminium Duffel BV joined this energy policy agreement in 2003 and is still committed to this agreement, with yearly verification and audits by the government in which our monitoring report and the decided measures to take regarding energy efficiency are followed-up. In previous sustainability reporting, only GHG scope 1 figures were published. We have now expand these figures with GHG scope 2 data as well.

Emission to air (tons CO₂)

○ GHG Scope 1 ● GHG Scope 2



As ALVANCE shares a commitment to GFG Alliance's carbon neutrality initiative by 2030 (CN30) and aims to position itself as a champion of GREEN ALUMINIUM, we set ourselves new goals in 2020 towards 2025 regarding our CO₂ emissions for GHG scope 1 + 2 + 3.

By 2025 (vs 2019), we want to reduce the CO₂-footprint of our Automotive products by 30% for GHG scope 1 + 2 + 3. This reduction will give our Automotive products a CO₂ footprint in the range of 3.9 to 4.4 kg CO₂ eq/kg of aluminium produced.

Projects we are working on to reduce GHG emissions include topics as electrification of our heating processes and internal transportation, as well as switching to low carbon-fired heating and topics as using more pre- and post-consumer aluminium scrap instead of primary aluminium.

Waste Management

The operations at ALVANCE Aluminium Duffel BV creates over 70 different types of waste in total. These include both hazardous (such as lubricant oil and chemicals) and non-hazardous waste streams (such as salt slag). These wastes are collected on-site and handled by certified waste companies for further treatment or to be recycled and reused.

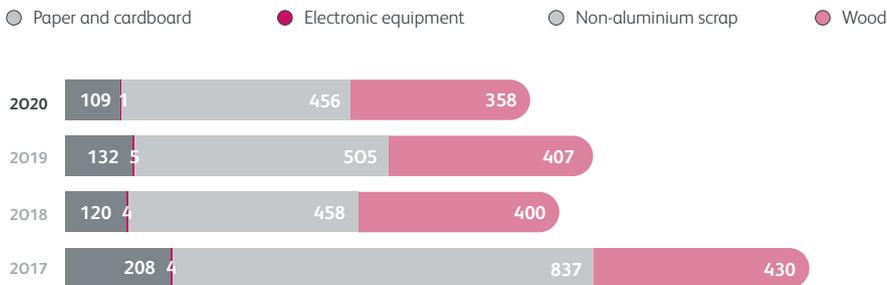
Our goal is to minimise the landfilling or incineration of waste wherever possible. Since 2020, our refractory waste material is being landfilled again, due to changes in the European legislation. We will further investigate on how to minimise our landfilled waste.

Waste totals tons

Stakeholder Group	2020	2019	2018	2017
Landfilled non-hazardous waste	50	0	0	0
Incinerated non-hazardous waste	261	329	240	362
Other non-hazardous waste (recycled or reused)	23,400	18,881	17,321	19,462
Total non-hazardous waste	23,711	19,210	17,561	19,284
Landfilled hazardous waste	0	0	0	0
Incinerated hazardous waste	192	228	220	204
Other hazardous waste (recycled or reused)	626	628	735	697
Total hazardous waste	818	856	955	901
Total Waste	24,529	20,066	18,516	20,725

Beyond the reuse of production waste, we encourage our employees to help us maximise the recycling of other materials used in the production halls and offices through dedicated recycling bins.

Recycling tons

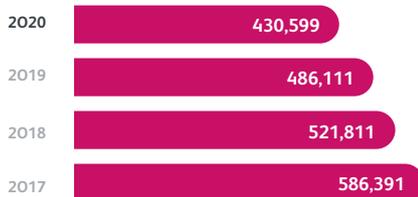


Managing Water Use Responsibly

Aluminium processing requires a relatively small amount of water compared to other industries. Water is primarily used as part of the production process for cooling.

While ALVANCE Aluminium BV is not located in an area of water stress, we still strive to use this precious resource responsibly. Since 2017, total water consumption (m³) in the plant has decreased by 24 %. This has been achieved by working on sealing leakages in water pipes, better monitoring of oil contaminations in the production departments, which leads to a lower responding time of the infrastructure department. By this less production water needs to be sluiced and less new water needs to be added to the internal water system.

Total process water consumption (m³)



Biodiversity

In 2020 an update of the biodiversity survey was made. Every “green” area that is present at the ALVANCE Duffel site is evaluated in this survey. All areas get a score regarding biodiversity, e.g. an area with trees and bushes will get a higher score than an area with only grass on it. The conclusion was that biodiversity on our plant had improved due to changes in the way of mowing our green areas. The plans for 2021 and the following years are to improve biodiversity in the green areas next to our admin building. A park area will be created, taking into account biodiversity in fauna and flora.

Our Forward Looking Plans



To source more low carbon primary metal over time, carefully selecting suppliers and equipment in order to be a leader in GREEN ALUMINIUM in Europe.



Continuing to scale up our program to increase the metal scrap used in Automotive products, expanding our closed loop program to more OEMs. Ultimately, our ambition is to achieve a full closed loop system with our Automotive customers, taking back 100 percent of the pre-consumer scrap related to our products for re-use in new similar products.



Becoming the lowest CO2 footprint supplier to the market for automotive applications.

Developing internal projects with a focus on the use of hydrogen in heating processes as replacement for natural gas. Investing in public charging stations for electrical cars.



Supporting renewable energy projects by entering into power purchase agreements. Launching renewable initiatives on site, taking into account the limitations due to the location of ALVANCE Aluminium Duffel BV.

Investing in continuous improvements to increase energy efficiency and metal yields, including new investment in cast house, hot mill, cold mill and CALP.



Removing invasive species on our premises and re-planting zones with extensive monoculture ground cover in favour of a more species-rich vegetation. The plans for 2021 and the following years are to improve biodiversity in the green areas next to our administrative building. Two biodiverse gardens will be created taking into account biodiversity in fauna and flora. Also more vegetation will be added to the parking area of the administrative building. One of the biodiverse gardens will be accessible for employees and neighbours.

Behaving as a Responsible Business

The success of our business is built on a foundation of strong corporate governance that is embedded throughout the company from our Board of Directors to the worker on the manufacturing floor. We expect all of our employees to operate in an honest and straightforward manner, demonstrating integrity.

Business Integrity and Ethics

We believe that with lasting integrity and compliant behaviour, ALVANCE Aluminium Duffel BV will maintain and strengthen relationships with customers, employees and the community. Behaving ethically and with integrity drives our corporate reputation and, ultimately, our business success.

Maintaining our Ethical Standards

Our Code of Conduct (COC) lays out our expectations for how employees must operate ethically and responsibly. We require our full-time salaried staff to be trained on the COC annually. Additionally, we conduct monthly trainings on specific compliance topics, and we host quarterly large-scale

online trainings on priority topics including anti-bribery, export controls, internal business controls, copyrights, use of company resources, respect in the workplace and information privacy. We also organise a refresher course on ethics on a regular basis.

Responsible Purchasing

To guarantee that our high standards on health, safety, fair treatment and environmental management standards are respected throughout our supply chain, we expect the same standards of our suppliers.

We encourage our metal suppliers to become member of the Aluminium Stewardship Initiative and obtain both the Performance Standard and Chain of Custody Certifications, in order to promote GREEN ALUMINIUM products in the market.

Any reported sustainability violations by our subcontractors and suppliers are investigated. In the case of a confirmed violation, a formal claim is made. This claim will be treated in a four-month period and in severe cases will be addressed using the eight disciplines problem solving (8Ds) methodology, the purpose of which is to identify, correct, and eliminate recurring problems.

All our suppliers are asked to complete our supplier sustainability survey on a regular basis, covering all aspects of sustainability. The results of the survey, combined with a corruption and human development index per country, and any claims from stakeholders and/or breaches of the law, lead to a risk assessment. In case of an unsatisfactory score, the supplier will be subject to an audit and could eventually be excluded from the supplier list in cases of non-compliance.

CONTACT INFORMATION

Complaints about sustainability issues from subcontractors or suppliers can be addressed to:

Tel: +32 15 30 21 11

info.duffel@alvancegroup.com



Supplier Code of Conduct

We have developed a Supplier Code of Conduct (SCOC) to ensure that all business partners, suppliers and manufacturers meet a minimum standard of expectations of doing business. These standards are based on well-respected and recognized international Human Rights and industry best practices, including the Principles of the United Nations Guiding Principles on Business & Human Rights and the principles of the United Nations Global Compact.

Fair and equal treatment

We expect from our suppliers:

- to support the protection of internationally proclaimed human rights;
- to fight **forced labour** (including modern slavery and human trafficking) and **child labour**;
- to uphold the **freedom of association and the right to collective bargaining** in accordance with applicable laws;
- to **treat its employees with respect** and provide a workplace free of harassment or abuse of any kind, harsh and inhuman treatment, unlawful practices and discrimination;
- to enable its employees and other stakeholders to **report concerns or potentially unlawful practices** at the workplace;
- to **comply with minimum wages and working hours** in accordance with local laws, and to ensure compensation of a living wage according to local living conditions.

Health, safety & environmental management

We expect from our suppliers:

- to have adequate processes and systems in place to **comply with all applicable local and international environmental, health and safety laws** and operations of the countries they are operating in;
- to promote the **safe and environmentally sound** development, manufacturing, transport, use and disposal of their products;
- to **use resources efficiently**, apply energy-efficient and environmentally-friendly technologies and reduce waste as well as emissions to air, water and soil;
- to **minimise the negative impact on biodiversity, climate change and water change**.

ALVANCE Aluminium Duffel BV reserves the right to audit compliance with this SCOC. These audits are facility inspections that include worker interviews and a review of the supplier records and business practices. If an audit identifies a violation of the SCOC, the supplier shall – at its own cost – act promptly to correct the situation with a corrective action plan.

Integrity

Our suppliers should:

- abide by all **applicable and international trade laws and regulations**, related to the manufacturing of its products, including but not limited to antitrust, trade controls and sanction regimes;
- consider **business integrity** as the basis of their business relationships;
- prohibit all types of **bribery, corruption and money laundering**;
- **forbid gifts to private and public officials** that aim to influence business decisions or otherwise encourage them to act contrary to their obligations;
- respect the **privacy and confidential information of all its employees and business partners** as well as protect data and intellectual property from misuse;
- implement an appropriate **Compliance Management System** which facilitates compliance with applicable laws, regulations and standards.

Compliance

We comply with national and international laws and regulations relevant to the industry, and broader regulations on preventing corruption, breaches of trusts, fraud or money laundering.

Data Management and Privacy

Following the implementation of the EU's General Data Protection Regulation (GDPR – Regulation (EU 2016/679)), we have taken a number of actions to ensure the GDPR-rules are well understood and respected throughout the relevant parts of the business. A mandatory training program has been introduced for all office employees, explaining the regulation in detail.

A Data Privacy team has been formed as a main point of contact regarding all GDPR issues and is entitled to take

measures should data leaks or incidents occur. A Technical and Organisational Measures policy (TOM) describes how data is and has to be protected physically and digitally in data centres, on computers, laptops and mobile devices. It also explains

how to prevent loss of data and how internal and external data is protected. An international security audit is carried out quarterly to measure the effectiveness of this system.

In 2020, no data incidents took place at ALVANCE Aluminium Duffel BV.

Our Forward Looking Plans



Further strengthening the evaluation criteria for both our metal and non-metal suppliers.



Renewing certifications against ASI Performance Standard and ASI Chain of Custody Standard in 2022

Contact details



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For further information visit www.alvancegroup.com

