ENVIRONMENTAL STATEMENT 2023

of

BEFESA

Aluminium Germany GmbH

Claude-Breda-Strasse 6
06406 Bernburg (Saale)

Telephone: 03471 - 62879-0
Email: aluminiumgermany@befesa.com

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Introduction

With the consolidated environmental statement (formerly the environmental and energy report), we inform the public about the environmental and energy status of Befesa Aluminium Germany GmbH, including measures already implemented for environmental protection, environmental performance, sustainable management, as well as energy efficiency improvements and objectives aimed at further reducing the environmental impact of our activities.

The environmental statement is prepared in accordance with the requirements of Annex IV of EMAS.

The environmental statement is intended for the interested public and aims to provide information in a concise and understandable form. The environmental statement thus replaces the previous environmental and energy report.

If you have any suggestions or questions, please contact the site's General Manager, Dr Georg Matthies.

Telephone: 03471 - 62879-0

Email: aluminiumgermany@befesa.com

We and the environment

Befesa Aluminium Germany GmbH is fully committed to environmental protection and has set itself the goal of minimising or entirely eliminating the environmental impact of its business activities. We are also committed to using minimal environmentally impactful materials that are as sustainable as possible at the Bernburg site. This supports ongoing development and ensures continuous improvement in environmental performance. We have expanded our environmental management system to meet EMAS regulation requirements, highlighting how important environmental action is to us.

- RESPONSIBILITY

We take responsibility for all our products, services, and other business activities. We recognise the importance of environmental protection, energy efficiency and sustainable practices, and we set the highest standards in these areas. Technical innovation, plant safety, occupational health and safety, as well as quality are fundamental to our commercial success. By optimising our processes, we continually improve our business activities.

- OPENNESS

We foster open dialogue on environmental protection, energy efficiency, and sustainability, aiming to raise, strengthen, and promote environmental awareness among our employees, suppliers, and customers.

- EMPLOYEE INVOLVEMENT

We actively involve our employees and the works council in enhancing our company's environmental performance. Employee suggestions are evaluated in our management meetings. Notices are posted to highlight matters of operational environmental protection, energy efficiency, and sustainability. The responsible teams and all employees regularly participate in training sessions on occupational health and safety, energy management, and environmental protection.

- COMMUNICATION

This environmental statement serves as an instrument for the company’s active public relations efforts on environmental protection and accountability. The report will be published on the group’s website, making it available to interested parties, public authorities, and clients.

The company

Company name:	Befesa Aluminium Germany GmbH
Legal form:	Private limited company
NACE code (WZ 2008):	24.42 Aluminium production and initial processing
Headquartered in:	06406 Bernburg (Saale)
	Claude-Breda-Strasse 6
	Telephone: 03471 – 62879-0
	Fax: 03471 - 6287950
Start of production:	December 2014
Commercial register entry:	Stendal District Court
	HRB 18773
Managing director:	Manuel Barrenechea del Arenal
General Manager	Dr Georg Matthies
	Telephone: 03471 – 62879-0

Brief description of the company:

Since 1987, Befesa has provided solutions for environmentally sensitive residues from the steel and aluminium industries and currently operates 24 plants across 8 countries in the USA, Asia, and Europe. Befesa has around 1,800 employees and, in 2023, processed approximately 1.9 million tonnes of waste. The company generated around 1.7 million tonnes of products that were returned to the economic cycle, conserving primary resources. Befesa has been listed on the stock exchange since 2017 and was added to the MDAX in 2021 (BFSA.MDAX). In 2023, sales reached €1.18 billion.

The Befesa Group, parent company of Befesa Aluminium Germany GmbH, aims to be a global leader in managing and recycling hazardous residues in the steel and aluminium industries, striving to play an increasingly significant role in a sustainable world and the circular economy.

Befesa provides sustainable solutions to the steel and aluminium industries by processing and recycling hazardous and environmentally significant residues from the value chains of secondary steel and aluminium producers, particularly crude steel dust, salt slag, and spent pot lining (SPL). Befesa has been part of the global recycling economy for over three decades.

The Befesa Aluminium Salt Slags Recycling Services division is organised into three distinct but complementary areas:

1. Recycling of salt slag, spent pot lining (SPL) and refractory lining
2. Secondary processing of aluminium scrap, dross, and other aluminium-containing residues to produce customer-specific aluminium alloys
3. Sale of technology and special equipment

Befesa Aluminium Germany GmbH, with its sole site in Bernburg/Saale, is part of Group 2 within the Salt Slag Services division, functioning as a secondary aluminium smelter. On 7 March 2014, Befesa Aluminium Germany GmbH was granted the emission control permit under Section 4 of the Federal Immission Control Act (BImSchG) for the construction and operation of the plant in Bernburg (Saale). Operations began on 1 December 2014.

As a secondary aluminium smelter, the company operates a fully continuous shift to produce aluminium alloys in both solid and liquid forms in foundries, customised to meet customer specifications. The secondary smelter can produce up to 90,000 tonnes per year of aluminium alloys from up to 145,000 tonnes per year of aluminium-containing scrap, concentrates, chips, dross, and similar secondary materials. The facility stores a maximum of 6,000 tonnes of waste, including up to 2,500 tonnes of hazardous waste. Up to 1,000 tonnes of aluminium salt slag is also temporarily stored in the storage area as production waste for further recycling.

Aluminium-containing input materials are melted down in modern tilting drum and flame furnaces equipped with energy-efficient burner systems, then refined to meet the required specifications. Befesa supplies its customers with aluminium alloys in both liquid form, transported by truck in specialised crucibles, and as solid ingots produced on an automated casting line.

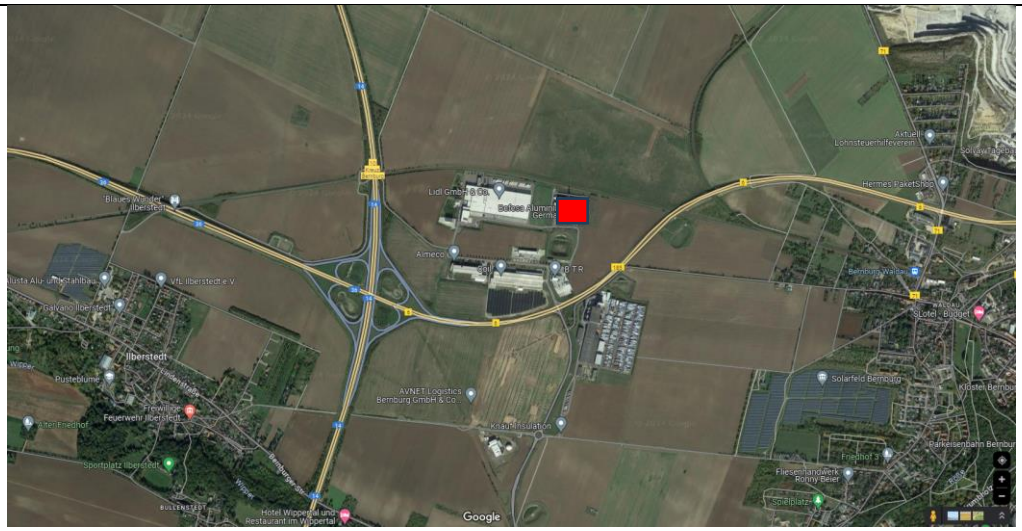
Befesa Aluminium Germany not only reduces environmental impact through its own optimised production processes, but the supply of liquid metal also provides an indirect environmental benefit for customers by lowering CO_2 emissions, as it eliminates the energy needed for remelting.

Location of the site

The plant is situated in the Bernburg-West industrial estate in the Salzland district of Saxony-Anhalt. The A14 motorway runs approximately 500 metres west of the plant site. The A36/B6n motorway lies to the south of the industrial estate. Other commercial enterprises are located directly next to the plant site.

The nearest residential areas are about 1,100 metres west in Ilberstedt and roughly 1,400 metres east in Bernburg.

Leipzig/Halle International Airport is located about 70 kilometres south-east of Bernburg, near the Schkeuditzer Kreuz junction (approximately a 45-minute drive).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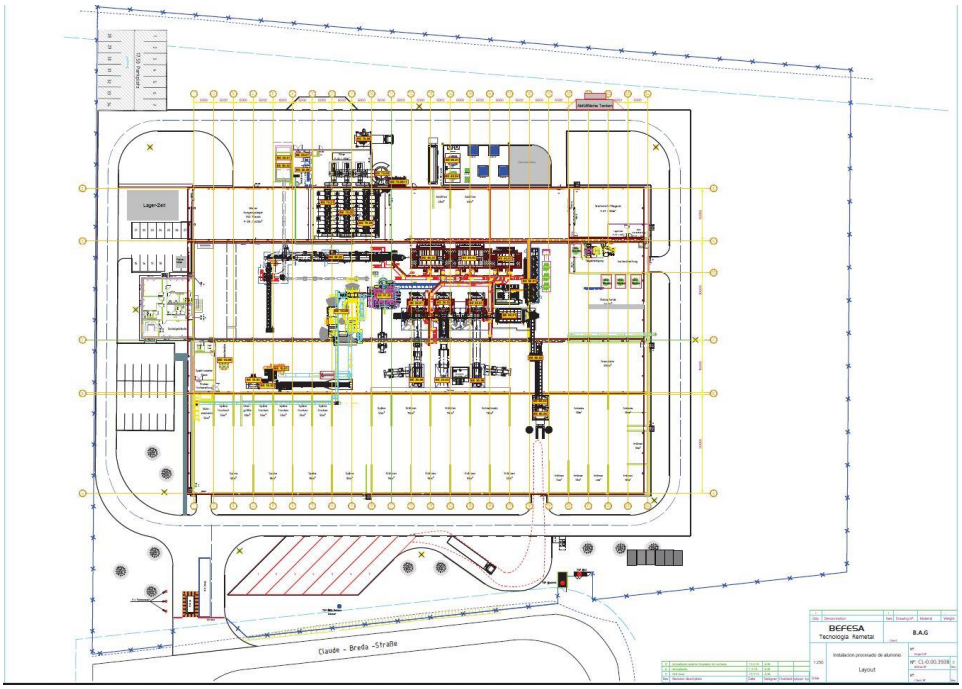
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Layout

Integrated policy for occupational health and safety, quality, environmental and energy management

Policy

We are dedicated to the continuous improvement of our products and processes, the enhancement of our occupational health and safety, environmental and energy management systems, and the ongoing advancement of our energy and environmental performance. We achieve this, among other efforts, through measurable results in tracking environmental aspects and implementing targeted measures. Befesa Aluminium Germany GmbH aims to reinforce its position as the industry leader in the secondary aluminium sector and lead sustainable development within the overall industry. We are convinced that integrating occupational health and safety with quality, environmental, and energy management is essential for achieving high-level production, sustainable success, and optimal performance in safety, quality, environment, and energy. Our management policy is established in line with our corporate principles, the relevant legal framework and the requirements of our stakeholders. We have defined our organisation's context, identified stakeholders, and binding obligations and analysed the resulting internal and external issues. Our corporate policy supports the objectives and initiatives arising from this. It also includes complying with external standards and the requirements of interested external stakeholders as well as fulfilling binding obligations. Below are the

Principles

- Senior management and all managers lead by example.
- We aim for ZERO accidents.
- We believe that all accidents, personal injuries, and property damage can be prevented and that all measures must aim to achieve this. We record and investigate all accidents to achieve sustainable improvements for all our direct and indirect employees.
- We never prioritise production or economic gain over the health and safety of our employees and contractors.
- The health and safety of our employees, subcontractors, and third parties, as well as environmental protection, are our top priorities and the most important aspects of our daily work.
- We enforce a constructive zero-tolerance approach whenever deviations occur.
- We firmly believe that active participation from everyone is the foundation of our success. We encourage dialogue and the ongoing involvement of all company members and service providers. The company actively promotes, requires, organises, and supports appropriate training and further education opportunities.

- Through systematic and planned actions, we establish a programme for training, research, and the prevention of defects and incidents, and we evaluate the effectiveness of the measures implemented.
- We support the procurement of energy-efficient products, processes, and services that enhance our environmental and energy performance. Additionally, we promote design activities that aim to improve our environmental and energy-related outcomes.
- We use the best available technologies and appropriate resources to comply with legal and regulatory requirements for occupational health and safety and environmental protection. Furthermore, we are committed to conserving resources, using energy efficiently, enhancing our environmental and energy performance, and meeting specific customer requirements.
- We apply the principle of continuous improvement to our manufacturing and management processes to ensure we produce high-quality products using reliable procedures. This approach enhances our expertise, maintains effective control, and minimises environmental impacts and hazards.
- We are committed to establishing annual, measurable targets for quality, health and safety, energy, and the environment. These targets are regularly reviewed, evaluated and published by the general manager.
- We develop, review, and maintain an integrated management system for occupational health and safety, the environment, quality and energy, in line with recognised international standards. We make available the necessary human and financial resources along with the information required to maintain the integrated management system.
- We are committed to regularly evaluating the integrated management system to ensure its suitability for the organisation.
- We are committed to complying with all binding obligations and applicable legal standards.

This policy is published and accessible to all.

An integrated view of the company's context

Befesa Aluminium Germany GmbH operates within social, legal, economic, and sustainable frameworks that significantly shape our mission and vision. These factors also guide the design, development, and implementation of our integrated management system to fulfil our strategic plan in line with group guidelines. Regularly identifying and reviewing relevant topics and objectives that affect our success and integrated management system, along with understanding their impact on outcomes, is essential to fulfilling this complex task. This is particularly relevant to the evaluation and continuous improvement of environmental and energy performance.

We have identified the interested parties and determined their expectations and requirements. We have identified and taken into account all potentially resulting binding obligations.

We review and update any changes to the context, internal and external issues, and binding obligations as they arise or at least once a year. We monitor environmental and energy performance annually and assess continuous improvement.

Categorising the production process

Befesa Aluminium Germany GmbH is a secondary aluminium smelter, classified under sections 3.4.1 and 3.8.1 of Annex 1 to the 4th Federal Immission Control Act (BImSchG).

The plant is authorised with:

- A melting capacity of up to 372 tonnes per day (maximum 90,000 tonnes per year),
- Stock preparation, with a throughput capacity of 120 tonnes of input materials per day,
- A foundry, including liquid loading, with a processing capacity of up to 372 tonnes per day, and
- Storage facilities for the temporary storage of hazardous and non-hazardous waste:
- Operating Unit BE 01.10.08: total storage capacity of 6,000 tonnes of waste,
    - including up to 2,500 tonnes of hazardous waste,
        - of which a maximum of 200 tonnes are classified as ASN 10 03 15*,
- BE 01.60.05 Aluminium Salt Slag (ASN 10 03 08*): capacity of 1,000 tonnes,
    - with up to 100 tonnes of aluminium salt slag (ASN 10 03 08* as raw material)
- Except for BE 01.60.01 to BE 01.60.04: these units handle slag cooling and include two storage silos with a total capacity of 400 tonnes of aluminium salt slag

The plant is located on the property in 06406 Bernburg (Saale), within the Bernburg district, parcel 73. Formerly, parcels 273, 274, 275, 276 and 1013. After conveyance, parcels 1018, 1019, 1020, 1021 and 1022.

Significant official authorisations required to operate the plant:

- Federal Immission Control Act (BImSchG)
- A building permit in accordance with Section 71 of the Saxony-Anhalt Building Code (BauO LSA)
- An indirect discharge licence in accordance with Section 58 of the Federal Water Act (WHG)
- Authorisation for work on Sundays and public holidays in accordance with Section 13 (5) of the Working Hours Act (ArbZG)

The secondary smelter can produce up to 90,000 tonnes per year of aluminium alloys, which are delivered to our customers in liquid and solid form, from up to 145,000 tonnes per year of aluminium-containing scrap, concentrates, chips, dross, and similar secondary materials.

To melt moist chips, they are first pre-classified using a sieve drum, then passed through magnetic separators to remove any ferrous components. The pre-treated chips are then transferred to a chip dryer, where water is vaporised, and the oil components are pyrolytically treated. The chips are dried using hot combustion gases rather than a direct flame. The system's exhaust air is channelled through an afterburner before being fed into the exhaust airflow.

Each of these pre-treatment processes, functioning as ancillary equipment to the smelting plant, requires a separate licence due to its classification under No. 8.11.2.2 in Annex 1 of the 4th BImSchV, based on daily throughput capacity.

In accordance with Section 1 (4) of the 4th BImSchV, the entire plant requires only a single permit, which was granted through a formal procedure on 7 March 2014.

The aluminium smelting plant is listed under No. 2.5(b) in Annex I of Directive 2010/75/EU on industrial emissions (IED). Hazardous substances, as defined in Article 3 of Regulation 1272/2008 (CLP Regulation), are handled within the plant under application.

The hazardous substances used, as defined by the CLP Regulation and the Hazardous Substances Ordinance - such as various melting salts, diesel fuel, lubricating and hydraulic oil, and calcium oxide - are classified in water hazard classes (WGK) 1 and 2, meaning they are slightly hazardous or hazardous to water.

Although these substances are classified as hazardous under the CLP Regulation, they pose no risk of groundwater contamination due to their quantities and classification in hazard levels A and B under the AwSV.

The integrated management system

Befesa Aluminium Germany GmbH's integrated management system, certified to DIN EN ISO 14001 and EMAS for environmental protection, DIN EN ISO 50001 for energy, DIN EN ISO 9001 for quality and DIN EN ISO 45001 for occupational health and safety, establishes procedures across all areas of the company. This system promotes a consistent approach to environmental, energy, health, safety, and quality standards in all relevant activities.

Annual group certification according to DIN EN ISO 14064-1:2018 is also conducted together with the smelting plants in Spain. For 2023, this equates to 0.89 t CO_2e per tonne of aluminium produced (Scope 1-3, including direct and indirect emissions). This makes Befesa one of the leading suppliers in its field.

The continual implementation and enhancement of our integrated management system drive ongoing improvements in environmental protection, energy efficiency, quality, working conditions, and sustainability. We meet all customer requirements, legal regulations, standards, and internal guidelines to protect our employees, minimise environmental impact continuously, operate sustainably and energy-efficiently, and build lasting partnerships with our customers.

A well-structured approach to environmental protection and energy management within the company is essential for sustainably achieving our environmental and energy goals.

The management system encompasses all areas of responsibility within Befesa Aluminium Germany GmbH.

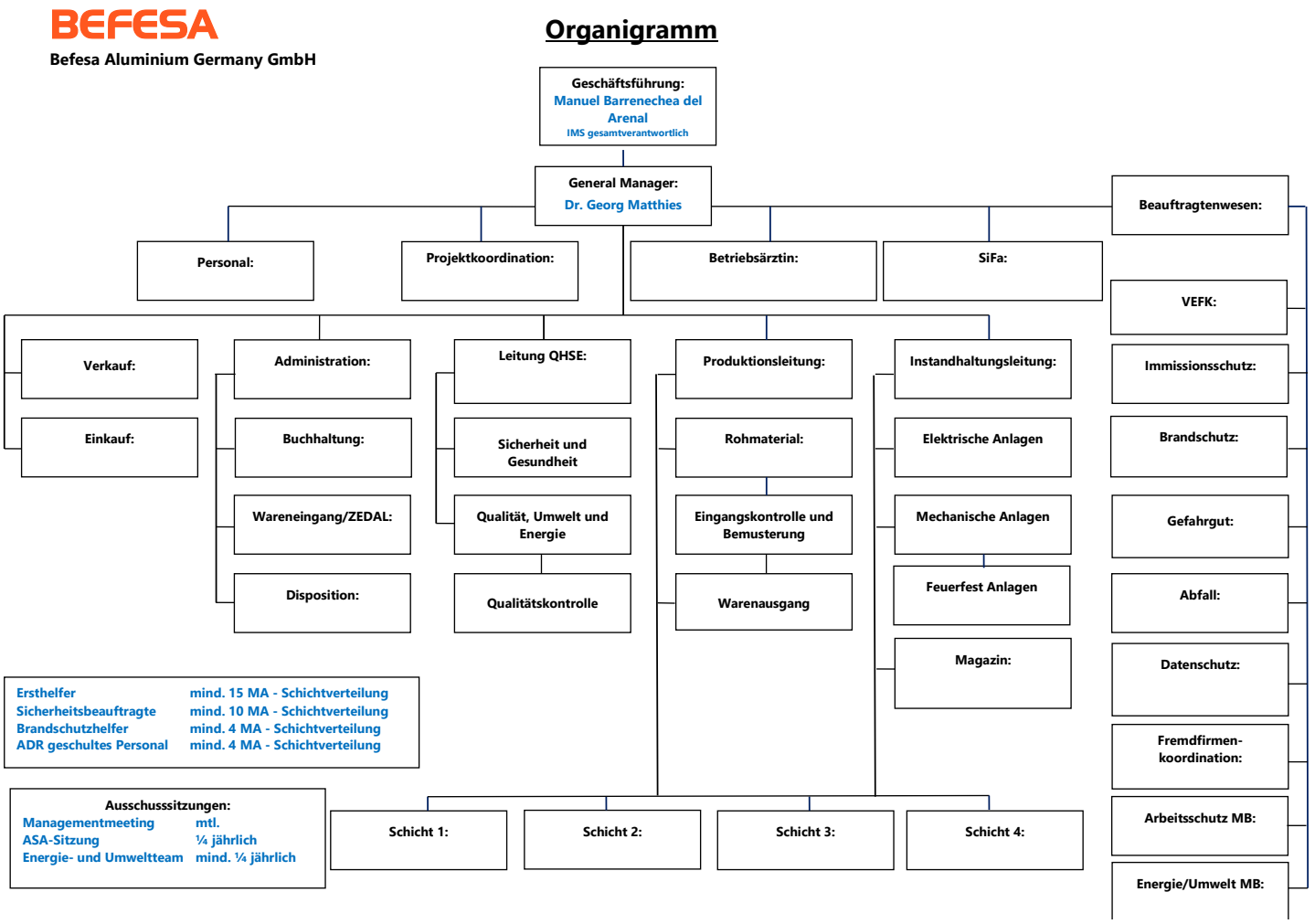
The following individuals are responsible for environmental protection in our company:

- The managing directors are responsible for the environmental, energy, occupational health and safety, and quality policies, creating the conditions for their implementation and engaging employees in these efforts.
- The entire management team is responsible for implementing and maintaining the environmental and energy management system within their respective divisions.
- The executive management is responsible for ensuring smooth operations and implementing corrective actions in the event of any deviations.
- The energy and environmental management officer is responsible for implementing measures to enhance environmental performance and increase energy efficiency within the company. They lead an environmental and energy team, which includes management and the heads of production, maintenance, sales, purchasing, human resources, and controlling.
- The environmental and energy team meets at least once per quarter. The meeting results are recorded in a central to-do list to monitor the progress of measures through to the effectiveness check.

The company has appointed legal representatives for immission control, waste management, hazardous materials, fire protection, data protection, a company doctor, an occupational safety specialist, and a responsible electrician. The representatives document their activities in annual reports.

The legally or officially required internal company officers are professionally qualified and report directly to the management. They are authorised and required to provide input on investment decisions related to new processes and products and must be consulted before planning operational facilities, work processes, and the introduction of materials. They are also authorised to access and inspect all business premises within their area of responsibility. They act independently, without external direction, when applying their expertise.

The external representatives communicate directly with site management, the managing director, and the QHSE department.



Direct and indirect environmental aspects and their impacts

We have identified and quantified the direct and indirect environmental aspects based on available permits, legal regulations, potential accident hazards, risks to the environment and personal safety, impacts on the surrounding community, resource consumption, sustainability, internal process guidelines, and our monitoring and measurement data. We use this information to identify significant environmental impacts and define appropriate measures. We have established key figures to enable year-on-year comparisons, providing a solid foundation for the continuous improvement of our environmental and energy performance.

Direct environmental impacts

For direct environmental impacts, assessment is conducted by creating a risk indicator using a matrix that combines severity and probability of occurrence with additional factors like legal regulations, authorisation requirements, and incident history, enabling targeted mitigation measures.

Environmental influence	Substance	Origin	Environmental impact	Relevance
direct	Salt slag	process-related	hazardous waste	high
direct	Filter dust	process-related	hazardous waste	high
direct	Combustion products	process-related	emissions	high

Tab. 1: List of relevant direct environmental factors and their impacts

The environmental impacts are reassessed annually by the environmental and energy team, or when there are significant changes or events, legislative changes, or shifts in the company's context. To assess significant environmental aspects, we use defined criteria such as relevance to authorisation, accident history, and other factors.

Indirect environmental impacts

Befesa Aluminium Germany GmbH aims to reinforce its position as the industry leader in the secondary aluminium sector and lead sustainable development within the overall industry. This also involves making a positive impact on indirect environmental impacts wherever possible. Assessing indirect impacts is also done in stages: first, the potential for influence and the need for alternatives are examined, followed by determining the severity of their impact. Mitigation measures can also be developed from this.

We consider indirect impacts from energy production, supplier transport, and the production and transport of spare parts and services that Befesa uses or that arise during the further processing of Befesa products. These are audited and certified annually in compliance with ISO 14064.

It should be noted that the production and supply of liquid metal have a higher direct impact, mainly due to the energy required for overheating the metal. However, this is more than offset by customer savings from eliminating the need for remelting. This saves approximately 435 kWh of energy per tonne of liquid metal supplied. This leads to environmental savings of 18.6 GWh per year. This equates to 3,718 tonnes of CO_2 equivalents.

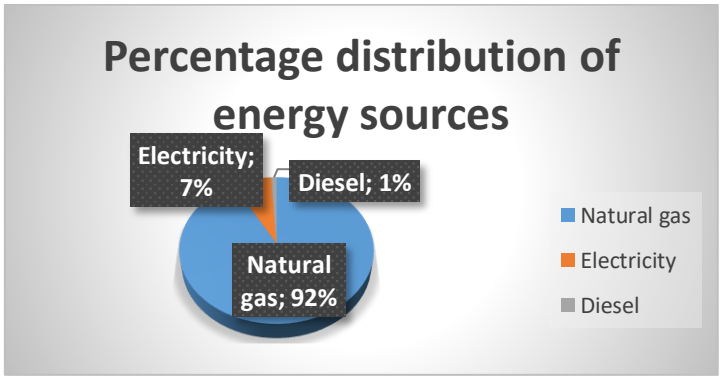
Additionally, priority is given to regional suppliers for raw materials, as well as for other retailers and service providers.

Befesa remains committed to reducing its environmental impact through small-scale initiatives. For example, Befesa offers employees the option to lease e-bikes to help reduce emissions from commuting. This option has been well received. Professional installation of charging facilities for e-bikes and e-cars is planned for the coming year.

Core indicators

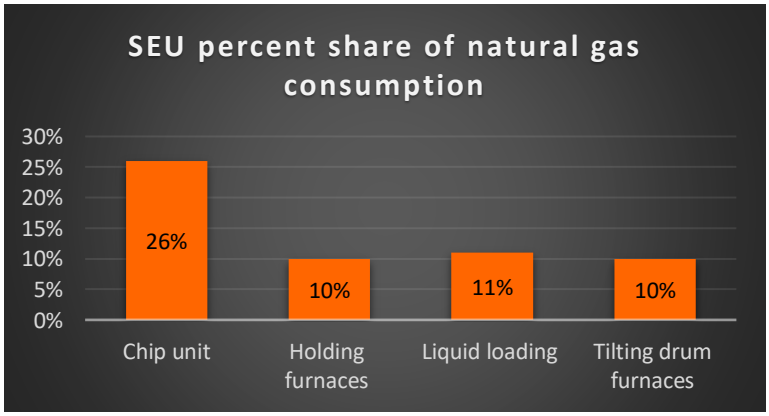
Energy efficiency

The company uses natural gas, electricity, and diesel fuel as energy sources:



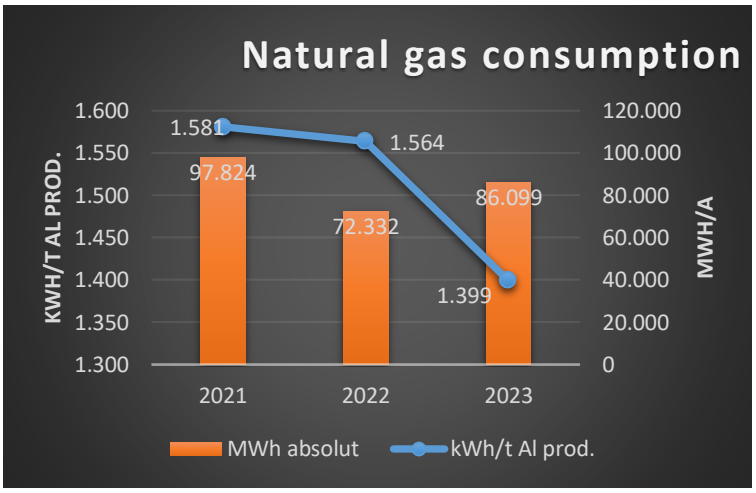
Natural gas

Natural gas is the primary energy source for our production. Natural gas is primarily used for operating burner technology, especially in melting and casting furnaces. The significant energy users (SEUs) are the following furnaces:



The chip unit includes preparation, drying, and a melting furnace; additionally, three holding furnaces and three tilting drum furnaces are in operation. Percentage values are displayed for each unit. This means the aforementioned SEUs account for 96% of total natural gas consumption.

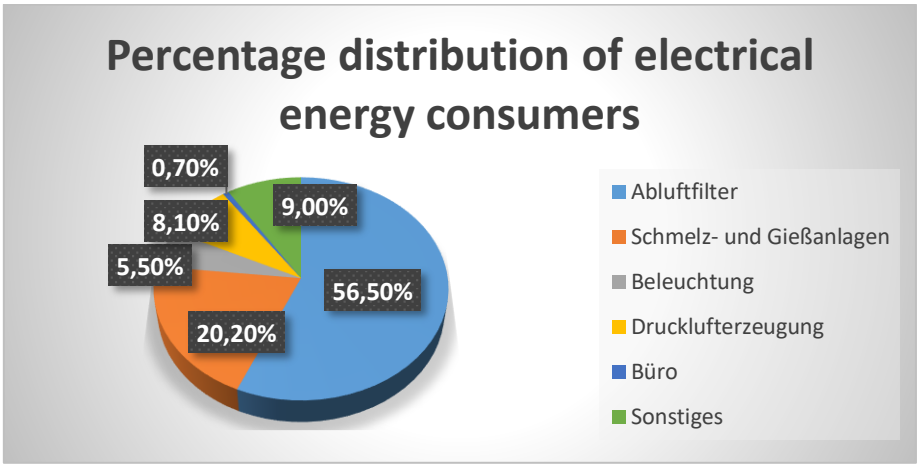
The following graph shows the absolute and specific natural gas consumption. The implemented measures are taking effect and are being continuously refined, leading to a further reduction in the specific key figure.



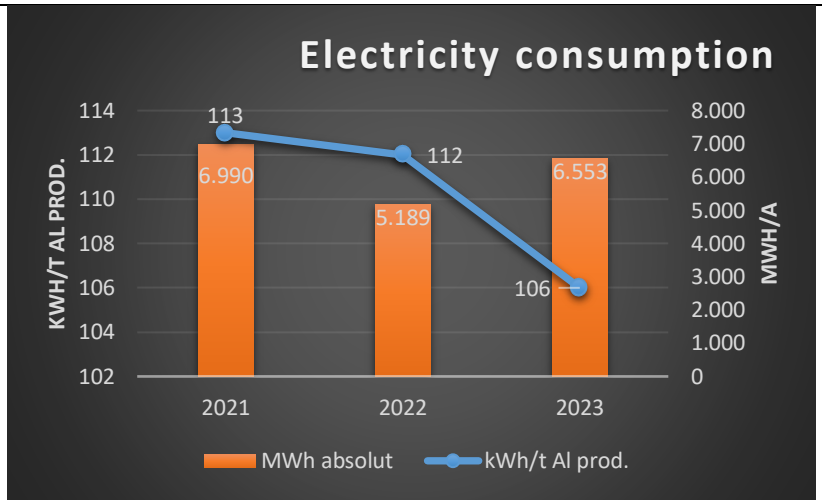
The drop in the absolute value in 2022 was due to production adjustments (operating in three shifts instead of four), as the plant's capacity could not be fully utilised because of a service provider's failure in the subsequent process chain.

Electrical energy

Electricity is sourced from the local grid. Approximately 60% of the electrical energy is sourced from renewable energy.



Electricity is primarily used for operating machine technology, especially the exhaust air filter system. A small percentage of total consumption is used for lighting and operating IT systems in administration and production.



When analysing specific consumption values, the trend closely mirrors that of natural gas. Here, too, further savings will be achievable through ongoing measures.

Diesel fuel - fuel consumption in production and company cars

The vehicle fleet in 2023 will include:

4 Volvo L90 wheel loaders

1 Volvo L45 wheel loaders

1 CAT M314 excavator

4 Linde forklift trucks

4 different diesel cars

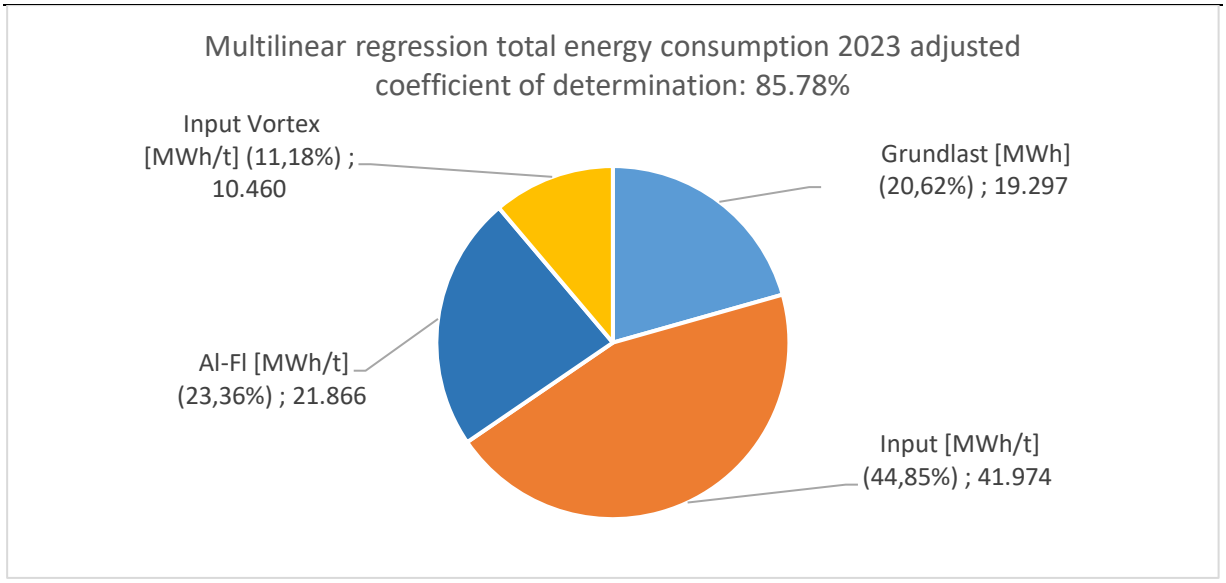
Diesel	Consumption [l]	CO2equi [kg/t Al input]
2021	113,610	3.16
2022	79,365	2.99
2023	105,281	2.93

The selection of vehicles and engines is based not only on requirements and needs but also on advancements in engine technology. This means that only modern, low-emission, and energy-efficient engines are used in the vehicles, as reflected in the development of the specific key figure.

Influencing variables

Static and variable factors are analysed, and their respective influences are evaluated. Multi-linear regression analysis is also applied to determine energy efficiency in relation to the key indicators.

In addition to the base load, the main influencing variables are the input into the chip unit, the proportion of liquid metal deliveries and the total input. This yields a coefficient of determination of 85.78%. The aim is to refine the influencing variables further using specific tools, enabling the introduction of more effective measures to improve efficiency.



Share of renewable energy, self-produced

In 2023, 58.23% of the electrical energy was generated from renewable sources. The provider's invoice details serve as evidence. Further long-term options for sourcing energy from renewable sources are also under discussion.

No renewable energy has been generated on-site to date. Options are being explored.

Material efficiency

The material efficiency is determined by the total input divided by the total output of the system. There is no clear trend here, owing to the waste characteristics of the input and the company's philosophy. Aligned with the parent company's vision, Befesa Aluminium Germany GmbH processes aluminium-containing scrap of nearly any quality. The circular concept, conserving primary resources, avoiding waste, and using state-of-the-art technology for aluminium recovery are central guiding principles of the organisation.

Year	2021	2022	2023
Metal yield [%]	65.4	66.1	64.2

The input materials are thoroughly analysed in advance, compiled and graded with supporting software to ensure the best possible combination of material and energy efficiency, as well as equipment utilisation and productivity in production.

Water

In addition to sanitary wastewater, operating the secondary aluminium smelter also generates wastewater from the cooling system of the aluminium recovery plants, which is discharged into the public wastewater system of the water utility association (WZV) “Saale-Fuhne-Ziethe”. The discharge is undifferentiated, as the sanitary wastewater component is minimal. Under Section 58 of the WHG, discharging wastewater into public wastewater systems (indirect discharge) requires authorisation. According to Section 13 of the BImSchG, indirect discharges are included in the authorisation outlined in Section 4 of the same Act.

The total water consumption was as follows:

Water	2021	2022	2023
Fresh water [m³/t Al produced]	0.439	0.597	0.411
Fresh water [m^3 abs.]	27,159	27,613	25,264
Slag removal [m³/t Al produced]	0.194	0.471	0.230
Slag removal [m^3 abs.]	12,022	21,803	14,176

The additional volumes in 2022 can also be explained by the change in production operations (operating three shifts instead of four).

The authorised bodies carry out the commissioned sampling and analysis of the sludge water on a quarterly basis. No reportable violations of limits have occurred.

The requirements of the 42nd BImschV have been met, and the inspection by an approved expert was carried out on time on 18 August 2021. The next expert inspection is scheduled for August 2025.

Waste

Waste is generated at the Befesa Aluminium Germany GmbH site during the production process. The type, quantity, and origin of waste are recorded in the waste register and updated by the waste management officer. Process-related waste, such as salt slag and filter dust, makes up the largest proportion by volume; indirect waste and municipal waste are also produced.

The secondary aluminium smelter uses aluminium-containing scrap, concentrates, chips, dross, and similar secondary materials as inputs for producing aluminium alloys. Most of the input materials mentioned are industrial waste utilised in the smelting plant. Waste is assigned waste codes according to the AVV. The treatment of waste is subject to the requirements of the Circular Economy Act (KrWG), which regulates the proper and harmless disposal of waste in Section 7 of the same Act. The proper disposal of the permitted waste at the smelting plant has been demonstrated.

Pursuant to Sections 49(1) and 49(2) of the KrWG, in conjunction with Section 51(1) of the same Act, we are subject to verification and registration obligations, which we fulfil in accordance with Sections 24 and 25 of the Ordinance on Waste Recovery and Disposal Records (NachwV).

In accordance with Section 5(1)(3) of the BImSchG, our plant operates to:

- avoid waste,
- utilise waste that cannot be avoided, and
- dispose of waste that cannot be recycled without adversely affecting the welfare of the general public.

The requirements of the KrWG are met.

We use representative sampling and analyses to accurately determine the pollutant content of the waste for its intended recycling and disposal routes. This fulfils the requirements of Section 7 Bas. 3 and Section 15(2) of the KrWG and meets the requirements of Regulation (EU) No. 850/2004 (EU POP Regulation) on persistent organic pollutants, as last amended by Regulation (EU) No. 519/2012.

We comply with the operator obligations under Section 5(1)(3) of the BImSchG by implementing regulated operating procedures, an appropriate operational organisation, and internal regulations. Waste management activities are monitored and traceable at all times.

The routine plant inspection under the IED Directive by representatives from several supervisory authorities of Saxony-Anhalt and the Salzland district took place on 11 November 2022, resulting in "no defects". An official waste inspection of the plant was conducted on 29 November 2023. No measures need to be initiated as a result.

Waste register

Waste generation at Befesa Aluminium Germany GmbH Bernburg 2023

Waste code	Waste description	Quantity 2023 [t]	t / t input
	Process-related waste:		
10 03 08*	Salt slag from the secondary smelting process	40,961	0.429
10 03 19*	Filter dust containing hazardous substances	1,718	0.018
19 12 02	Ferrous metals	688	0.007
19 02 07*	Oils and concentrates from separation processes	72	0.001
	Indirect waste:		**Kg/t input**
15 01 03	Wooden packaging	4.3	0.045
15 01 10*	Packaging containing residues of hazardous substances or contaminated by hazardous substances	0.21	0.002
15 02 02*	Absorbent and filter materials (including oil filters not otherwise specified), wiping cloths and protective clothing contaminated with hazardous substances	1.1	0.012
16 11 04	Other linings and refractory materials from metallurgical processes, excluding those specified in 16 11 03	11.36	0.119
17 04 11	Cables with the exception of 17 04 10	0	0
17 09 04	Construction and demolition waste	20	0.209
	Municipal waste:		
20 03 01	Mixed municipal waste	1.8	0.189

Totals: 43,477.16

The salt slag produced is processed 100% without residues, and the resulting products are reintegrated into the economic cycle. 64% of the filter dust is utilised and 36% is landfilled. The aim is to further increase the recycling rate, which still faces logistical challenges.

Other waste is collected, recorded, recycled, and disposed of separately within the company. Wherever possible, the KrWG philosophy is consistently applied. Certificates from the respective certified and/or authorised waste management companies are available. The requirements of the Commercial Waste Ordinance are met.

More than 97% of the waste produced is recycled and reused in accordance with the KrWG, indirectly conserving other primary resources.

Emissions

Exhaust gases generated during the production process are treated in purification facilities to ensure emissions and resulting immissions never exceed the limit values specified in the operating licence.

The threshold value in the table below refers to the reporting obligation under the PRTR Regulation.

In 2023, responsible supervisory officials from the State Administration Office and other supervisory authorities conducted both announced and unannounced visits. No complaints were received.

The emissions listed in the table below are calculated using emission factors and capture efficiencies recognised for reporting under the 11th BImschV.

Emissions

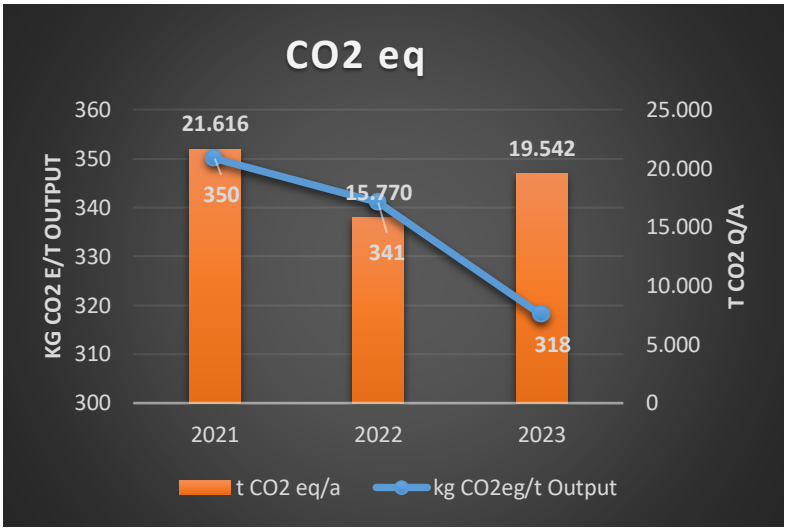
Production volume [t/a]	61,872	46,238	61,531
	2021	2022	2023
	kg/a	kg/a	kg/a
SO_2	951.25	710.89	946.01
HF	8.732	6.525	8.684
HCL	17.685	13.216	17.588
NH_3	185.62	138.71	184.59
CO	4,193.58	3,133.96	4,170.49
CO_2	15,213,885.36	11,369,699.36	15,130,136.90
N_2O	482.08	360.27	479.43
Hg	0.27	0.20	0.26
CH_4	3,712.31	2,774.30	3,691.87
NO_2	34,933.35	26,106.53	34,741.06
Organic gases excluding CH_4	25,223.95	18,850.46	25,085.09
V	0.00764	0.00571	0.00760
Cr	0.00764	0.00571	0.00760
Ni	0.0267	0.0200	0.0266
Cu	0.0131	0.0098	0.0131
Zn	0.192	0.143	0.191
Cd	0.00215	0.00161	0.00214
Pb	0.0507	0.0379	0.0505
Dioxins	0.0000118	0.0000088	0.0000117
Dust	60.412	45.147	60.079

All loads are below the threshold values for PRTR reporting.

Additional climate-relevant gases, such as sulphur hexafluoride (SF_6), hydrofluorocarbons (HFCs), and others like PFC, NMVOC and NF_3, are not generated at the site.

The drop in annual production volumes in 2022 was due to a temporary loss of capacity for salt slag processing. The amount of waste had to be actively decreased. Production was reduced accordingly. This was achieved by switching to a three-shift operation. In 2023, the system returned to full continuous operation.

The site-related CO_2 equivalents (Scope 1+2), calculated using BUA V1.6 June 2022 emission factors, show the following trend:



Biodiversity

The property used by Befesa Aluminium GmbH is located in the Bernburg West industrial estate.

Site area: 40,000 m^2,
Sealed area: 23,400 m^2
Near-natural area: 16,600 m².
Site coverage ratio (sealed area/total area) = 0.58

According to the development plan, a site coverage ratio of 0.80 is permitted. If possible, a reduction in the site coverage ratio will be pursued through work in the outdoor area. Since 2018, Befesa Aluminium GmbH has owned an additional 36,000 m² to the east, previously used for agricultural purposes. Plans are underway to expand the plant, with most of the development to take place on previously unused areas. Where possible, the planning considers retaining near-natural areas, and voluntary compensatory measures are included.

Other indicators

Best available techniques

For installations under Directive 2010/75/EU on industrial emissions, applicable BAT reference document conclusions are followed where available. A BAT reference document is also available for the best available techniques in secondary aluminium smelting within the non-ferrous metals industry. The conclusions of the BAT reference documents were published on 30 June 2016. After review, no action is needed at the site.

Noise

The development plan specifies emission limits of 70 dB(A)/m² during the day and 60 dB(A)/m² at night. For the directional sectors where immission points 1 to 6 are located, emission limits are 3 dB(A)/m² higher, as specified in the development plan (sound impact assessment report available). Proof of compliance with noise limits at two designated locations, as outlined in the ancillary provisions of the BImSch licence, is available and shows that permissible limits were undercut by at least 6.8 dB(A).

Annual measurements are conducted within the plant to assess noise emissions and vibrations. No need for immediate action was identified. As a preventive measure, further improvement potential is analysed, actions are implemented, and their effectiveness is evaluated.

Heating system

The district chimney sweep inspected the heating system on 1 January 2022 in line with Section 14 of the First Ordinance on the Implementation of the Federal Immission Control Act (Ordinance for Small Combustion Systems); no defects were identified. The next inspection is scheduled for October 2024.

Handling of water-hazardous substances

Handling of water-polluting and hazardous substances (environmentally relevant materials) at specific points is essential during the production process at Befesa Aluminium Germany GmbH.

As part of our emergency management, all plant components used for storing or handling water-polluting substances are equipped with protective devices to prevent any leakage into the groundwater. This includes constructing floor slabs made of waterproof concrete with additional waterproofing beneath the slabs and foundations in all production and storage areas. Tanks for water-polluting liquids are fitted with suitable drip pans. This WHG liner was professionally installed by a specialist company, tested, and documented with proof dated 1 November 2013.

A company petrol station was put into operation on 22 August 2019. Proper and professional installation, commissioning, and operation prevent soil and groundwater contamination. The installation was carried out by a service provider for the installation of storage, filling and transfer (LAU) systems, inspected and authorised as a specialist company under Section 62 (1) of the AwSV.

Distance from the system to the nearest protected areas:

Designation	Location	Distance to the system
Linear FFH area 257, “Wipper below Wippra”, and the protected landscape area “Wipperniederung”.	Southwest	Approximately 1500 m
FFH area 164, “Alluvial forests near Plötzkau”	Southeast	Approximately 2200 m

During procurement, particular emphasis is placed on the environmental compatibility and sustainability of the materials. The HSEQ manager records hazardous substances used in the production process in the hazardous substances register.

Safety data sheets are available within the company for the safe handling of water-polluting and hazardous substances (environmentally relevant substances). Procedural and operating instructions for hazardous substances are integrated into the environmental management system.

Employees of Befesa Aluminium Germany GmbH were also instructed in the use of hazardous substances based on developed operating instructions in accordance with Section 14 of the Hazardous Substances Ordinance (GefStoffVO). An accident and emergency management system has been established for unforeseen events. The company has implemented technical protective measures to prevent soil contamination from water-polluting and hazardous substances (environmentally relevant substances).

Soil and groundwater protection

The plant is located in a designated commercial/industrial area in the town of Bernburg.

For the substances used (including various melting salts, diesel fuel, lubricating and hydraulic oils and calcium hydroxide), Annex 2 of the Federal Soil and Contaminated Sites Ordinance (BBodSchV) does not specify any required actions, tests or precautionary limits. The hazardous substances handled at the aluminium smelting plant are therefore not relevant to soil contamination at the site. However, classifications in accordance with the AwSV have been established and are regularly reviewed and updated as needed!

Specially designed areas are used to store hazardous substances, which are safeguarded against accidental leakage by drip pans or double-walled tanks. Sufficient quantities of oil-binding agents are available. Technical and organisational safety measures have been implemented for hazardous substances.

Rainwater runoff from the roof surfaces and paved areas is directed to the sewer system in accordance with the authorisation.

Occupational health and safety

For Befesa Aluminium Germany GmbH, occupational health and safety matters are as important as environmental protection.

Accidents, near misses, and incidents are recorded, investigated, analysed, and used to implement further protective measures. In this regard, extensive investigations are conducted and additional programmes are implemented to continuously raise awareness among our employees. The goal is zero accidents!

Health and safety are continuously integrated into the procedural and operational instructions of the management system. Occupational safety measures apply not only to the company's own employees but also to others on site. Employees of external companies working for us, as well as visitors, are equally protected and must comply with our safety requirements. More detailed information is available in the safety expert's report.

Transport and traffic / Transport of hazardous goods

Deliveries and product transportation are carried out solely by lorry on the road. Liquid metal, filter dust, and drilling emulsion are classified as hazardous goods in the outgoing materials. In 2023, there were 3,020 deliveries of liquid metal, 95 of filter dust, and 14 of drilling emulsion.

The main hazardous goods transported in are liquefied gases (nitrogen and oxygen), diesel fuel and waste with AVV 100315*. In 2023, there were 770 deliveries.

Monitoring and control tasks are handled by the externally appointed dangerous goods officer, with data documented in the ERP system. The relevant report is available. As in previous years, no incidents were reported in 2023.

Emergency management

We have developed a comprehensive hazard defence and emergency preparedness plan, coordinated with the local fire service. This includes regular inspections, fire protection and emergency drills, as well as ongoing coordination with the relevant authorities. We have trained specialist employees, including an internal fire safety officer, fire safety officers, and first aiders, with equipment installed and staff trained annually.

Emergency situations are tested in a practical manner regularly, at least once a year. Records of the emergency drills are kept to improve handling of safety and environmental emergencies.

Emergency situations mainly include the following:

- Fires
- Explosions
- Natural gas leaks
- Spillage of products and/or liquid aluminium
- Faults in the extraction filtration system
- Accidents involving injury and/or illness
- Power failures during the melting process
- Pandemics
- Detection of radiation
- Weather-related hazards (heat, cold, hail, storms, heavy rain, snow load, dew, wind, flooding, and extreme weather events linked to climate change)

In the event of a fire, water must not be used as an extinguishing agent, except in the administration area. Along with serious safety hazards, harmful gases such as ammonia may also be released. Sufficient quantities of extinguishing salt are therefore always available on site. Colleagues are regularly trained on this aspect alongside the local fire service and receive appropriate behavioural training. The use of salt also helps prevent soil contamination caused by the absence of liquid.
The risk of a fire spreading to the neighbourhood is minimal due to the surrounding development.

Compliance

A comprehensive legal register is kept. We stay informed about innovations through external consultancy firms, membership in associations, and newsletters. We compare the innovations with our existing requirements and adjust our processes as needed. In addition to our operating licence, the following legal regulations are crucial to us: BImSchG, ArbSchG, GefStoffV, GGV, WHG, AwsV, AbwV, KrWG, GewAbfV, IED Directive.

At least once a year, compliance with legal requirements is systematically reviewed both internally and throughout the Group. Any corrective measures are tracked in a central to-do list and given high priority within our company. We are also regularly checked and inspected by the relevant authorities.

Sustainability

Befesa operates with a focus on ecological, economic, and social factors, giving high priority to the three pillars of sustainability.

Befesa closes resource cycles by collecting hazardous waste and residues, recycling them and reintroducing valuable materials back into the production process. Four core principles drive the cycle:

- Reducing the consumption of natural resources
- Recycling hazardous residues from secondary steel and aluminium production
- Recovering recyclable materials from used products using the best available technology
- Reintroducing recovered materials into the cycle.

Sustainability, along with the tightening of environmental and energy regulations, has been a key driver for Befesa in recent years and will continue to be the main growth driver moving forward, as environmental policy challenges increase and the development of climate-neutral industrial production becomes more crucial. In this context, Befesa's business model has proven beneficial for environmental protection and sustainability, while also achieving profitable growth.

Befesa Aluminium Germany GmbH is committed to sustainable development and aims to satisfy all stakeholders through excellent management. Excellence is achieved through continuous investment in innovation, not only by adapting our equipment and processes to the best available technologies but also by contributing to the development of these technologies, ensuring a more sustainable future.

Befesa believes in the circular economy and develops energy-efficient processes that, on the one hand, produce minimal waste, and on the other, reintroduce secondary raw materials into industrial activity, reducing the reliance on non-renewable natural resources. Sustainable management, leadership in the circular economy, active participation in decarbonisation processes, and minimising the carbon footprint are continually increasing both internal and external responsibilities and requirements.

Along with intensive training, the organisation of Health Days together with regional partners, support from local associations, and active involvement in charitable campaigns highlight and promote the importance of comprehensive sustainability.

Input and output overview for 2023

The input-output overview data was compiled in collaboration with the EMB/UMB and the HSEQ manager. The relevant measurement logs, notifications, and invoices were analysed for this purpose. Where direct data was unavailable, the figures were reliably extrapolated.

The result is displayed in the two straightforward input-output tables below. The specific comparative figures and indicators are presented separately in the previous sections.

Input

Input	2021	2022	2023
Raw materials			
Waste acceptance [t]	74,892	51,962	75,192
Granulate, other [t]	23,470	21,208	21,646
Melting salt [t]	9,529	7,110	8,627
Liquefied gases [t]	7,911	4,604	8,000
Other raw, auxiliary, and operating materials [t]	193	273	381
Energy source			
Electricity [kWh]	6,990,119	5,188,796	6,552,724
Gas [kWh]	97,823,969	72,332,013	86,099,499
Diesel [l]	113,610	79,365	105,281
Water [m³]	27,159	27,613	25,264

Output

Output	2021	2022	2023
Products [t]	61,872	46,238	61,501
Waste [t]	44,878	34,130	43,477
Wastewater [m³]	12,022	21,803	14,176
Airborne emissions [t]	15,284	11,422	15,192

Goals

The environmental and energy team develops environmental and energy goals and measures based on corporate guidelines, the ESHQ strategy and key environmental aspects. The works council is involved in this process to ensure workforce participation in the development and formulation of environmental goals. If necessary (e.g., due to changes in production processes or system adjustments), the targets and resulting measures are modified and/or supplemented.

Environmental and energy goals not only drive continuous improvement in environmental performance, but also secure the company's long-term competitiveness. Internal process descriptions define responsibilities and deadlines. Progress toward achieving the goals is regularly monitored through internal audits and management reviews.

Goal assessment 2023

Goal	Aspect	Measure	Status
Reducing power consumption in the casting furnaces	Use of electrical energy	Installing frequency inverters	✓ Goal met
Reduction in power consumption of the chip unit's melting furnace	Use of electrical energy	Installing frequency inverters	✓ Goal met
Reducing power consumption in compressed air generation	Use of electrical energy	Installing an additional compressed air dryer with temperature-dependent operation	✓ Goal met
Enhancing transparency of measures and their impact	Energy efficiency	Shortening the frequency of evaluation rounds to monitor implementation levels and effectiveness of measures	✓ Goal met
Increasing awareness among all employees	Behaviour	Visualising process parameters and openly communicating progress	✓ Goal met
Reduction in natural gas consumption of the chip unit's melting furnace	Use of natural gas	Optimising process parameters for combustion air preheating	✓ Goal met

Goals and programme 2024-2026

Goal	Aspect	Measure	Responsible entity	Deadline
Reducing power consumption in the casting furnaces	Use of electrical energy	Converting the FI control system to process data-supported automation	Maintenance management	2nd half of 2024
Reduction in power consumption of the chip unit's melting furnace	Use of electrical energy	Converting the FI control system to process data-supported automation	Maintenance management	2nd half of 2024
Reducing gas consumption in the tilting drum furnaces	Use of natural gas	Installing a more energy-efficient JBL burner in test mode	Maintenance management	2nd half of 2024
Reducing power consumption in filter system	Use of electrical energy	Impact of the process adjustment to FC operation, achieved by reducing the total exhaust air volume	Maintenance management	2024
Creating ecological compensation areas	Biodiversity	Creating a bee meadow through additional sowing and planting extra trees	UMB	2024-2026
Energy-efficient engineering	Energy efficiency of future plants	The impact of energy-related experience and legal changes (e.g. GEG) on the engineering of capacity expansion at the site	Project coordination	2024-2026
Expansion of certification	Organisation / Management	Preparation for ASI certification	General manager	2025-2026
Conversion to e-mobility	Emissions	Installation of e-charging facilities for cars and e-bikes	Maintenance management	2025
Fresh water savings	Water	Testing condensation options for process vapour and returning water to the production plant	Project coordination	2025-2026
Substituting fuels	Emissions	Accompanying the group-wide test procedure for H2-ready burner technology in Valladolid	Project coordination	2024-2026
Increasing the recycling rate of process-related waste	Waste	Solution to the logistical limitation of filter dust utilisation versus disposal	UMB	2024-2026

The environmental statement for 2024 will be published by our company in spring 2025.

Further information on Befesa Aluminium Germany GmbH and the entire Befesa Group can be found at www.befesa.com, e.g. in the ESG progress report of Befesa AG.

Bernburg, 7 August 2024

.....	.....
Site management	QHSE manager

Declaration of the environmental verifier regarding the verification-validation activities

The undersigned EMAS environmental verifier, Mr Martin Peters, under the registration number DE-V-0362, accredited for the scope 24.42 “Aluminium production and initial processing”, confirms that Befesa Aluminium Germany GmbH, as outlined in this consolidated environmental statement for 2023, meets all the requirements of Regulation (EC) No. 1221/2009 of 25 November 2009, Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II, and III, and Commission Regulation (EU) 2018/2026 of 19 December 2018 amending Annex IV, on voluntary participation by organisations in the Community eco-management and audit scheme (EMAS).

By signing this declaration, it is confirmed that

- the assessment and validation were carried out in full compliance with the requirements of Regulation (EC) No. 1221/2009, in conjunction with Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026;
- the assessment and validation results show no evidence of non-compliance with the applicable environmental regulations;
- the data and information in the 2023 Environmental Statement of Befesa Aluminium Germany GmbH in Bernburg/Saale accurately reflect a reliable, credible, and truthful picture of all activities within the scope outlined in the environmental statement.

This declaration does not constitute EMAS registration. EMAS registration can only be granted by a competent body in accordance with Regulation (EC) No. 1221/2009 of 25 November 2009 and Commission Regulation (EU) 2017/1505 of 28 August 2017. This declaration may not be used as an independent basis for public communication.

Based on the reviewed documents, interviews (employee surveys), other information, and a comprehensive site inspection, it is hereby confirmed that

Befesa Aluminium Germany GmbH's
Claude-Breda-Str. 6
D-06406 Bernburg

environmental policy, environmental programme, environmental management system, environmental audit, environmental auditing procedure and the 2023 environmental statement comply with the requirements of Regulation (EC) No. 1221/2009 of the European Parliament and Council of 25 November 2009, as well as Regulation (EU) 2017/1505 of 28 August 2017.

The data and information in the consolidated environmental statement are reliable, and all relevant aspects of the site have been properly considered. The updated environmental statement will be published in spring 2025.

I hereby declare this consolidated environmental statement for 2023 to be valid.

Bernburg, 22 August 2024

Martin Peters
Environmental verifier - Authorisation no: DE-V-0362