# ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

# Aluminium GmbH Nachrodt

CERTIFICATE NUMBER
**107**

ASI STANDARD
**PERFORMANCE STANDARD (V3.1 2023)**

CERTIFICATION LEVEL
**FULL CERTIFICATION**

ASI ACCREDITED AUDITING FIRM
**TÜV RHEINLAND CERT GmbH**

DATE OF ISSUE
**23 APRIL 2026**

DATE OF EXPIRY
**22 APRIL 2029**

CERTIFIED SINCE
**5 JANUARY 2021**

AUTHORISED BY

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

Production of extrusion billets from Recycled Aluminium Scrap at Aluminium GmbH Nachrodt located in Nachrodt-Wiblingwerde, Germany.

# AUDIT REPORT **PERFORMANCE STANDARD**

## OVERVIEW

| | |
|---|---|
| MEMBER NAME | Alu-met GmbH |
| ENTITY NAME | Aluminium GmbH Nachrodt |
| CERTIFICATION SCOPE | Production of extrusion billets from Recycled Aluminium Scrap at Aluminium GmbH Nachrodt located in Nachrodt-Wiblingwerde, Germany. |
| SUPPLY CHAIN ACTIVITIES | • Aluminium Re-melting/Refining<br>• Casthouses |
| ASI STANDARD | Performance Standard V3.1 |
| AUDIT TYPE | • Initial Certification Audit (9 – 11 November 2020)<br>• Surveillance Audit (10 – 11 May 2021)<br>• Surveillance Audit (29 October 2021)<br>• Surveillance Audit (3 July 2023)<br>• Re-Certification Audit and Scope Change (3 – 5 December 2024)<br>• Surveillance Audit (22 January 2026) |
| AUDIT FIRM | TÜV Rheinland Cert GmbH |
| AUDIT DATE | • 9 – 11 November 2020 (Initial Certification Audit)<br>• 10 – 11 May 2021 (Surveillance Audit)<br>• 29 October 2021 (Surveillance Audit)<br>• 3 July 2023 (Surveillance Audit)<br>• 3 - 5 December 2024 (Re-Certification Audit and Scope Change)<br>• 22 January 2026 (Surveillance Audit) |
| AUDIT REPORT SUBMISSION | • 4 December 2020 (Initial Certification Audit)<br>• 14 June 2021 (Surveillance Audit)<br>• 9 February 2022 (Surveillance Audit)<br>• 11 November 2024 (Surveillance Audit)<br>• 14 January 2025 (Re-Certification Audit and Scope Change)<br>• 20 April 2026 (Surveillance Audit) |
| AUDIT SCOPE | Initial Certification Audit (9 – 11 November 2020)<br>Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse.<br>Supply chain activities included in the Audit Scope:<br>• Aluminium Re-melting/Refining<br>• Casthouses |

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (November 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (10 – 11 May 2021)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (May 2021), access to the site was limited, due to COVID-19 related travel restrictions. The audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and on-site observations for relevant criteria.

Surveillance Audit (29 October 2021)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

Criteria in the ASI Performance Standard that were identified as non-conformities from the previous surveillance Audit were included in the Audit Scope.

The Audit has been undertaken as a 'desktop' exercise consistent with the Entity's overall maturity level and the audit type.

Surveillance Audit (3 July 2023)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

The Audit Scope was limited to specific criteria in the ASI Performance Standard that were identified as non-conformities (or related to) from the previous surveillance Audit.

Re-Certification Audit and Scope Change (3 -5 December 2024)

The Audit Scope included the production of extrusion billets from Recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt, Germany.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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| | Surveillance Audit (22 January 2026)<br>The Audit Scope included the production of extrusion billets from Recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt, Germany.<br>Supply chain activities included in the Audit Scope:<br>• Aluminium Re-melting/Refining<br>• Casthouses<br>The Audit Scope was limited to specific criteria in the ASI Performance Standard that were identified as non-conformities (or related to) from the previous Surveillance Audit. |
| AUDIT OUTCOME | • Certification |
| AUDIT METHODOLOGY DECLARATION | The Auditors confirm that:<br>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<br>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<br>☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<br>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective. |
| CERTIFICATION PERIOD | 23 April 2026 – 22 April 2029 |
| NEXT AUDIT TYPE | Surveillance Audit |
| NEXT AUDIT DATE | 22 April 2028 |
| CERTIFICATE NUMBER | 107 |
| | If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: **https://aluminium-stewardship.ethicspoint.com/**<br>EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.<br>Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages. |

## ENTITY OVERVIEW

Aluminium GmbH Nachrodt (the 'Entity') was founded in 1997, the site has a history of over 210 years. What began in 1809 with the production of sewing needles has evolved over 200 years into the current production of Aluminium extrusion bolts, with various products and materials being manufactured at the site over this period.

For over 60 years, Aluminium has been processed at the site with two pot lines – where Aluminium is cast, extruded, and anodised for surface treatment. The Entity's direct customers are extrusion plants where the extruded profiles are used in the automotive, construction and solar sectors.

The Entity currently has 65 employees, and the foundry has a capacity of up to 80,000 tonnes annually.

## MATURITY RATINGS

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

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

| | GOVERNANCE | ENVIRONMENT | SOCIAL | COMBINED RATING |
|---|---|---|---|---|
| **SYSTEMS** | Medium | Medium | Low | MEDIUM |
| **RISKS** | Medium | Medium | Medium | MEDIUM |
| **PERFORMANCE** | Medium | Medium | Medium | MEDIUM |
| **OVERALL** | | MEDIUM | | |

## FINDINGS

| CRITERION | RATING | COMMENT |
|---|---|---|
| 1. BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has developed and implemented Policies, systems, procedures and processes that conform to ASI Performance Standard's legal requirements. The General Manager is designated as having overall responsibility for legal compliance. There are systems in place (e.g. a legal database and qualified legal advisers) to maintain awareness of and to ensure Compliance with Applicable Law. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certificates from an accredited certification body to ensure compliance with Applicable Law. The latest audit report (August 2024) did not identify any non-conformances. |
| 1.2 Anti-Corruption | Conformance | The Entity has issued an anti-Corruption guideline and communicated it internally and externally, available at: https://alu-met.com/en/standorte<br><br>An external tax auditor annually audits the Entity's financial system. The Entity is not directly active on the market as all purchasing and sales of metals are managed by the parent company, Alu-Met GmbH. Annual financial audits (conducted by licensed external tax auditors) demonstrate the Entity's correct financial behaviour. Transparency International's Corruption Perceptions Index 2023 for Germany, where the Entity is located, is 78 (rank 9).<br><br>All employees receive regular anti-Corruption training. |
| 1.3a-e Code of Conduct | Conformance | The Entity's parent company Alu-Met GmbH has issued and communicated documents (Social Standards document, anti-Corruption guideline) including principles relevant to environmental, social and governance performance that apply to the Entity. These documents are available at: https://alu-met.com/en/standorte<br><br>All employees receive regular training on the Entity's Code of Conduct (called 'Social Standards'). |
| 2. POLICY AND MANAGEMENT | | |
| 2.1a-f Environmental, Social, and Governance Policy | Conformance | The Entity has issued and communicated internally and publicly its Policy addressing environmental, social and governance aspects, available at: https://alu-met.com/en/standorte<br><br>In accordance with the ASI Performance Standard as well as their Environmental and Health and Safety Management System, the Entity has senior management endorsement and support through the provision of resources and regular review of the Policies. The Entity has obtained ISO 14001, ISO 45001 and ISO 50001 certification, consistent with their ASI Performance Standard Certification Scope. |
| 2.2a-c Leadership | Conformance | The Entity's Managing Director has the ultimate responsibility and authority to ensure conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the ASI Performance Standard. They are supported by the Head of Quality as an ASI representative for the Alumet Group. |

| CRITERION | RATING | COMMENT |
|---|---|---|
| 2.3a Environmental and Social Management Systems – Environmental | Conformance | The Entity has documented and implemented an integrated Management System, with certified facets according to ISO 14001:2015 and ISO 50001:2018. The certificates are available at: https://alu-met.com/downloads/#Zertifikate<br><br>There are no overdue or open actions from the latest audit report of the certification body. |
| 2.3b Environmental and Social Management Systems – Social | Conformance | The Entity has developed and implemented a documented Social Management System. Processes and procedures are in place that are appropriate (given the size and circumstances of the Entity) for this stage of implementation of the Entity's Social Management System. Relevant elements of a Management System have been defined (e.g. objectives, action plan, internal audit, and review). |
| 2.4a-e Responsible Sourcing | Conformance | The Entity's parent company Alu-Met GmbH has implemented a Responsible Sourcing (Verantwortungsvolle Beschaffung) in German, available at: https://alu-met.com/en/standorte<br><br>The Entity does not source Aluminium itself as this is undertaken by its parent company, which has implemented a process for supply-chain-related risk identification and assessment. Alumet Group (including the audited Entity) is certified against the ASI Chain of Custody Standard. |
| 2.5a-g Environmental and Social Impact Assessments | Not Applicable | This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facility.<br><br>The Entity has established a procedure specifying how to manage major projects. Since the Entity's parent company joined ASI, there have been no projects requiring the Entity to assess Human Rights impacts. The projects undertaken have required an environmental and health and safety assessment, which has been demonstrated. |
| 2.6a-h Human Rights Impact Assessment | Not Applicable | This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to the existing Facility.<br><br>A procedure specifying how to specify how major projects are to be managed. Since the Entity's parent company joined ASI, there have been no ongoing projects requiring the Entity to assess cultural and Human Rights impacts. The projects undertaken have required an environmental and health and safety assessment, which has been demonstrated and is part of the ongoing permitting process. |
| 2.7a-f Emergency Response Plan | Conformance | The Entity has developed site-specific emergency response plans in collaboration with relevant Stakeholders such as the local fire brigade. The Entity also holds ISO 14001 and ISO 45001 certifications that are current and consistent with the Entity's scope of certification under the ASI Performance Standard. The emergency plan is available to relevant Stakeholders on request |
| 2.8a-d Suspended Operations | Conformance | The Entity has established emergency plans and any associated situations where it may have to suspend or significantly alter operations due to factors outside its control. A Business Continuity Plan has been issued. The Entity's management concluded that there was no need for action beyond existing measures. |

| CRITERION | RATING | COMMENT |
|---|---|---|
| 2.9a-b Mergers and Acquisitions | Conformance | The Entity has not undergone or planned a Merger or Acquisition (M&A) activity since the Entity joined ASI. M&A events would be managed by the Entity's parent company Alu-Met GmbH, which has a process established to manage M&A events, should it become relevant. |
| 2.10a-b Closure, Decommissioning and Divestment | Conformance | The Entity is not the owner of the production Facility but does rent the site from another company. Therefore, the closure terms are defined in the rental agreement. The Entity is well-established, there are no known plans for closing/decommissioning. The Entity's site is located in a highly regulated country (Germany), where relevant projects and changes (including closure and decommissioning) must undergo a thorough analysis and authorisation process, and the Entity has systems in place to manage this effectively. Closure, decommissioning and divestment is managed by the Entity's parent company Alu-met GmbH, which has a process established to manage such process, should it become relevant. |
| 3. TRANSPARENCY | | |
| 3.1a-b Sustainability Reporting | Conformance | The Alumet Group has prepared its Sustainability Reports for 2022 and 2023 to report on its governance approach and Material environmental, social and economic impacts. The Report is based on GRI (Global Reporting Initiative) G4 criteria. The Report in German only is published on Alu-Met GmbH website: https://alu-met.com<br><br>Sustainability Report 2022 & 2023: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 3.2 Non-compliance and Liabilities | Conformance | The Entity's parent company has publicly disclosed information on fines and associated information in the Alumet Group in its Sustainability Report 2022 & 2023, page 36: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf<br><br>As testified by management, there were no fines or similar paid in the reporting period or the current year of this Audit. |
| 3.3a-c Payments to Governments | Conformance | As confirmed by management, all payments to Governments were made on a legal and/or contractual basis. The Group did not make any payments to political parties or politicians.<br><br>The Sustainability Report 2022 & 2023 of the Alu-Met Group (Section 3.8, page 36), the Group has given information on payments to political parties, politicians or similar, available at: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | The Entity has established accessible Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established, and is accessible to all Stakeholders: help@alu-met.com<br><br>A physical complaint mailbox also provides for the option for anonymous worker complaints. Due to the size and nature of the business, Stakeholders can also easily reach senior management directly. The Entity demonstrated the effectiveness of its Grievance Mechanism by showing the successful implementation of corrective actions. |

| CRITERION | RATING | COMMENT |
|---|---|---|
| 4. MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment | Conformance | The Entity has evaluated the life cycle impacts of its products and published the data in an environmental product declaration, available at: www.ibu-epd.com https://alu-met.com/wp-content/uploads/2022/11/EPD-Aluminium-Pressbolzen-AGN.pdf |
| 4.1b-c Environmental Life Cycle Assessment - Disclosure | Conformance | The Entity has evaluated the life cycle impacts of its products and published the data in an Environmental Product Declaration (EPD), available at: www.ibu-epd.com https://alu-met.com/wp-content/uploads/2022/11/EPD-Aluminium-Pressbolzen-AGN.pdf<br><br>The EPD is based on a 'cradle-to-gate' approach and the underlying standards are ISO 14025, EN 15804+A1 and ISO 14044. The Environmental Product Declaration (EPD-ALU-20200021-IBB1-DE) published by the Alumet Group provides details of the boundaries, underlying assumptions and data sources. |
| 4.2 Product Design | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.3a-b Aluminium Process Scrap | Conformance | As confirmed by interviews, document review and the site tour, the Entity has systems and a robust program to recycle about 100% of its Aluminium Process Scrap, either within its site, within the Alumet Group or at external partners. The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium. The effectiveness of these processes has been demonstrated through document review and a site tour. |
| 4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.4d Collection and Recycling of Products at End of Life | Conformance | The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products. As a recycling/remelting operation, the Entity has close contact with recycling systems, as confirmed by their supplier list. |
| 5. GREENHOUSE GAS EMISSIONS | | |
| 5.1a-b Disclosure of GHG Emissions and Energy Use | Conformance | The Entity accounts for and publicly discloses its Material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis. Greenhouse gas emissions are determined and published in the Sustainability Report 2022 & 2023 (pages 24-25). Site-specific data (THG Emissionen gesamt AGN) are provided for Scopes 1 and 2 (direct and indirect emissions) (pages 26-29), available at: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf<br><br>The energy data for 2022 and 2023 have been independently verified by an external consultant. The Entity has implemented and maintains an Energy Management System in accordance with ISO 50001:2018 which has been certified by an accredited certification body. Specific carbon footprint ('cradle-to-gate') is included in a publicly available |

| CRITERION | RATING | COMMENT |
|---|---|---|
| | | Environmental Product Declaration (EPD): https://alu-met.com/wp-content/uploads/2022/11/EPD-Aluminium-Pressbolzen-AGN.pdf |
| 5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3a GHG Emissions Reduction Plans | Conformance | The Entity has established and implemented a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway using the ASI GHG Pathways Method and Calculation Tool.<br><br>The Entity has developed and is implementing measures to reduce its GHG emissions, although these initiatives are restricted by external dependencies on the availability of low carbon Primary Aluminium.<br><br>The GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway are made publicly available in the Entity's addendum to the Sustainability Report at: https://alu-met.com/wp-content/uploads/2026/01/Alu-met_Nachhaltigkeit_ASI_Anhang-zum-Nachhaltigkeitsbericht-2022-2023.pdf. |
| 5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure | Conformance | The Entity has defined specific GHG emissions reduction targets as part of its annual environmental/energy program. The program is reviewed on an annual basis internally and by an auditor from an accredited certification body.<br><br>The Entity's GHG emissions reduction targets are published in the Group's Sustainability Report 2022 & 2023, section 3.4.1.1, and in the addendum to the Sustainability Report, available at: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf and<br><br>https://alu-met.com/wp-content/uploads/2026/01/Alu-met_Nachhaltigkeit_ASI_Anhang-zum-Nachhaltigkeitsbericht-2022-2023.pdf |
| 5.4 GHG Emissions Management | Conformance | The Entity has implemented an effective Environmental and Energy Management System according to ISO 14001 and ISO 50001 and continuously improves the reduction of emissions and energy use. The certificates are available at: https://alu-met.com/downloads/#Zertifikate.<br><br>The latest external audit report (addressing ISO 14001, ISO 45001 and ISO 50001) did not identify any non-conformities. |
| 6. EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1a-f Emissions to Air | Conformance | The Entity periodically reports on its Emissions to Air that have adverse effects on humans or the environment, the emissions are disclosed in the Report, pages 32-33: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |

| CRITERION | RATING | COMMENT |
|---|---|---|
| | | As requested by the relevant authority, measurements are undertaken by an accredited independent laboratory every three years. |
| 6.2a-g Discharges to Water | Conformance | The Entity discharges only cooling water directly into water (creeks or rivers). The other effluents (stormwater and sanitary water) produced are treated in the publicly owned wastewater treatment plant. The directly discharged water does not have adverse effects on humans or the environment (the discharged quantity of the cooling water is less than 0.001% of the river's flow rate). The Entity regularly analyses the characteristics of the water discharged. Water-related data including data on Discharges to Water have been made publicly available in the Sustainability Report 2022 & 2023, page 31-32, and in the addendum to the Sustainability Report, available at: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf and https://alu-met.com/wp-content/uploads/2026/01/Alu-met_Nachhaltigkeit_ASI_Anhang-zum-Nachhaltigkeitsbericht-2022-2023.pdf |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance | The Entity has established an emergency plan and, as part of its ISO 14001 certified Environmental Management System, the Entity has established management and external communication plans, compliance controls and a monitoring programme to prevent and detect Spills and leaks (daily inspection and systematic maintenance). |
| 6.4a-b Public Disclosure of Spills and Leakages | Conformance | As part of its accredited Environmental Management System, the Entity has established procedures to ensure disclosure to affected parties of the volume, type and potential impact of significant Spills immediately after an incident.<br>As reported in the Sustainability Report 2022 & 2023 there was no significant release of substances in the reporting year (section 3.7), page 36: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 6.5a-c Waste Management and Reporting | Conformance | The Entity has collected data on waste generation and disposal. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods, are reported in the Sustainability Report 2022 & 2023 (section 3.6.3), page 35: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 6.6a-g Bauxite Residue | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7a-f Spent Pot Lining (SPL) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8a-d Dross | Conformance | The Entity works continually to maximise the recovery of Aluminium through the treatment of Dross and Dross residues. Key factors include worker training, furnace technical parameters and the remelting process. The Entity sends all recovered Dross to a recycling Facility, so there is no Dross residue on site and therefore not landfill. |

| CRITERION | RATING | COMMENT |
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| 7. WATER STEWARDSHIP | | |
| 7.1a-b Water Assessment and Disclosure | Conformance | The Entity has a system in place to identify and map its water withdrawal and use by source and type. The Entity's assessment of water-related risks in Watersheds in its Area of Influence concluded that there are no Material risks to Watersheds. |
| 7.2a-e Water Management | Not Applicable | This Criterion is not applicable to the Entity, as the assessment of water-related risks did not identify a significant risk, as the annual use of spring water is approximately 30,000 cubic metres per year. The production site is not located in a water scarce area (where annual rainfall is approximately 800-1,100 millimetres (mm)). |
| 8. BIODIVERSITY AND ECOSYSTEM SERVICES | | |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment | Conformance | The Entity's production site is in an industrial area of approximately 2.5 hectares. A detailed Biodiversity and Ecosystem Services impact assessment for the Entity's activities was conducted in 2021 by a specialised external consultancy firm. The assessment contained detailed proposals for the management to direct the development and implementation of a Biodiversity Action Plan. The plan is regularly updated. Due to the size and nature of the business and its location, it is concluded that the impact on Biodiversity and Priority Ecosystem Services is not Material. |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Not Applicable | This Criterion is not applicable to the Entity, the commissioned Biodiversity and Ecosystem Services study concluded that Priority Ecosystem Services are not Material to the Entity, as the study did not identify Priority Ecosystem Services that are relevant to Affected Populations and Organisations. |
| 8.2a-g Biodiversity Management | Conformance | The Entity has established a Biodiversity Action Plan and implementation of specific actions is either ongoing or complete. The plan is regularly reviewed and updated. Biodiversity has been incorporated into the Entity's annual management review process. Information about the plan is publicly available in Sustainability Report 2022 & 2023, pages 36-37: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 8.3a-c Management of Priority Ecosystem Services | Not Applicable | This Criterion is not applicable to the Entity, as the commissioned Biodiversity and Ecosystem Services study concluded that Priority Ecosystem Services are not Material to the Entity. This study did not identify Priority Ecosystem Services that are relevant to Affected Populations and Organisations. |
| 8.4 Alien Species | Conformance | The Entity's thermal processing of the Aluminium Scrap, any potential Alien Species and pathogens are destroyed. A residual risk includes supplied wooden pallets, which are externally incinerated (with heat recovery). The factory area within the Entity is regularly cleaned of neophytes (during summer periods). |
| 8.5a-b Commitment to "No Go" in World Heritage Properties | Conformance | The Entity's site is not located in or near World Heritage Properties, as confirmed by site visits and the UNESCO map of word heritage (https://whc.unesco.org/en/statesparties). |

| CRITERION | RATING | COMMENT |
|---|---|---|
| | | However, the Entity has committed itself in writing a 'no-go' Policy (to not explore or develop New Projects or make Major Changes in World Heritage Properties). |
| 8.6a-d Protected Areas | Conformance | The Entity has identified Protected Areas in its Area of Influence. Its site is located adjacent to a Protected Area (Naturschutzgebiet Klippkes). The measures to foster Biodiversity are also suited to minimise the impact on this area. The Entity publicly reports its actions in its Sustainability Report 2022 & 2023, pages 36-37: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |
| 8.6e Protected Areas - Bauxite Mining | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 8.7a-i Mine Rehabilitation | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 9. HUMAN RIGHTS | | |
| 9.1a-d Human Rights Due Diligence | Conformance | The Entity's parent company Alu-met GmbH has issued a Management Policy and a Social Standards document, expressing a commitment to respect Human Rights. Both documents apply to the Entity in full, please see: https://alu-met.com/en/standorte<br>The Entity has conducted a documented Human Rights Due Diligence assessment based on the CSR Risk Check of MVO Nederland (https://www.mvorisicochecker.nl/en).<br>As witnessed by management and according to the Human Rights Due Diligence study, the Human Rights assessments have confirmed that there are no salient adverse Human Rights impacts present at the audited Entity. This was confirmed during interviews during the Audit. The Entity has not caused or contributed to adverse Human Rights impacts and therefore no remedial action is required. |
| 9.2a-e Gender Equity and Women's Empowerment | Conformance | As confirmed by site tour, document review and interviews during the Audit, the Entity has developed and communicated Policies that conform to the requirement to promote women's rights: https://alu-met.com/en/standorte<br>The Entity has established and implemented a documented program that promotes gender equity and women's empowerment. |
| 9.3a-i Indigenous Peoples | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. |
| 9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. |
| 9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

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| 9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. |
| 9.5a Cultural and Sacred Heritage – Identification | Conformance | The Entity has issued and implemented a procedure to identify whether sacred or cultural heritage sites and values within their Area of Influence may be directly affected by its operations. The outcome confirmed that there is no Material impact on such sites or values. |
| 9.5b Cultural and Sacred Heritage – Impacts | Not Applicable | This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence. |
| 9.6a-i Displacement | Not Applicable | This Criterion is not applicable to the Entity, as no resettlements are planned or have taken place since joining ASI, nor are expected to take place during the certification period. |
| 9.7a-h Affected Populations and Organisations | Conformance | The Entity respects the legal and customary rights and interests of Local Communities. All relevant activities are subject to a permitting process, and the Entity maintains adequate contact with community officials. A plan to identify, prevent, monitor, mitigate and account for the significant impact (environmental noise) has been established and implemented. |
| 9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems | Conformance | The Entity does not purchase metals directly, as the purchased activity is sourced and managed by Alu-Met GmbH as part of the Alumet Group. Alu-Met GmbH has implemented an effective Management System, including a Policy for responsible sourcing: https://alu-met.com/en/standorte<br><br>The responsibilities and resources, information gathering and supplier engagement to ensure that the Group does not contribute directly or indirectly to armed conflict and/or Human Rights abuses. All of the Group's Primary Aluminium suppliers are certified to the ASI Performance Standard. |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks | Conformance | The Entity's parent company Alu-Met GmbH has implemented a process for risk-based Due Diligence for its Aluminium supply chain, which includes systematic identification and assessment of risks in the supply chain (including both suppliers of Aluminium Scrap and Primary Aluminium). |
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks | Conformance | A strategy to respond to identified risks is established by the Entity's parent company and has demonstrated that it responds to identified risks (e.g. by delisting suppliers). |
| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence | Conformance | The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit (December 2024), which addresses this requirement. |
| 9.8e Conflict-Affected and High-Risk Areas - Report annually | Conformance | Aluminium (both primary and Scrap material) is sourced by the Entity's parent company Alu-met GmbH, not by the Entity. The Entity via the Alumet Group reports publicly about the process and results of their supply chain Due Diligence in the Sustainability Report 2022 & 2023, (section 1.6), pages 10-12: https://alu-met.com/wp-content/uploads/2022/11/Nachhaltigkeitsbericht-2024-final.pdf |

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| 9.9 Security practice | Conformance | The Entity does only employ unarmed porters, there are no security guards. Document review and worker interviews confirmed that the private provider of the porter respects Human Rights in line with recognised standards and good practices. |
| 10. LABOUR RIGHTS | | |
| 10.1a-c Freedom of Association and Right to Collective Bargaining | Conformance | The Entity respects the right of Workers to organise freely and to seek representation without interference. A freely elected Worker representation process is in place. As confirmed by interviews with Workers and management during the Audit, the Entity has an open attitude towards the election of a Works Council. The Entity is not bound by industry sector Collective Bargaining Agreements (CBAs) negotiated between the employer association and the relevant union. Instead, a CBA is agreed between the Worker representation and the employer. The public commitment (Social Standards document) includes a commitment to Freedom of Association and the right to collective negotiations. |
| 10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law | Not Applicable | This Criterion is not applicable to the Entity, as Applicable Law in Germany does neither restrict the right to Freedom of Association nor Collective Bargaining. The Entity has an open position on employee representation. |
| 10.2a-c Child Labour | Conformance | The Entity does neither use nor support the use of Child Labour and the minimum working age of 15 years is respected. At the time of the Audit, the youngest Worker was 24 years old, as confirmed by interviews and the employee roster. An effective process has been implemented to prevent Child Labour. |
| 10.3a-c Forced Labour | Conformance | The Entity does not engage in or support the use of Forced Labour, as confirmed by interviews with Workers and management and a review of documentation. The Entity has prohibited all forms of Forced Labour in the Social Standards document: https://alu-met.com/en/standorte<br><br>The Modern Slavery Statement is available at: https://alu-met.com/wp-content/uploads/2024/05/statement-modern-slavery_en.pdf |
| 10.4a-c Non-Discrimination | Conformance | The Entity is committed to non-Discrimination and communicates this commitment in its Management Policy, available at: https://alu-met.com/en/standorte<br><br>Employees receive annual refresher training on 'social standards' and 'ethics and sustainability', which includes non-Discrimination. "Information leaflets are distributed to promote non-Discrimination.<br><br>As confirmed by interviews and document review, the Entity does not actively engage in Discrimination for the grounds mentioned in this criterion. |
| 10.5 Communication and engagement | Conformance | As confirmed through interviews and document review undertaken during the Audit, the Entity ensures open communication and direct engagement with Workers. Nominated Workers function as safety representatives (Sicherheitsbeauftragte), a joint Health and Safety Committee has been established, and an anonymous letter box to raise suggestions or concerns is available. Workers meet daily with |

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| | | their supervisors to discuss work-related issues. Due to the small number of Workers, the Entity practices an 'open door' policy as opposed to institutionalised systems for employee engagement. Additionally, Worker representatives meet regularly with management.<br><br>The Entity has issued a documented procedure which commits to direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment. |
| 10.6a-g Violence and Harassment | Conformance | Interviews and document review undertaken during the Audit confirmed that the Entity does not engage in or tolerate inappropriate and unacceptable treatment of Workers. An adequate documented guideline on Violence and Harassment at the workplace has been issued. The guideline is the subject of mandatory annual training for all Workers. |
| 10.7a-c Remuneration | Conformance | As verified by a review of payslips, time records and interviews, the Entity respects the right of Workers to a living wage. Wages are based on the Remuneration set by the collective agreement between the employers' association and the Trade Union (industry standard), although the Entity does not participate in these negotiations. Instead, a collective agreement is negotiated directly between the Entity's works council and management.<br><br>As verified by document review and interviews during the Audit, wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employee's bank accounts and pay slips are provided to employees, which are detailed and understandable. |
| 10.8a-c Working Time | Conformance | Working Time is included as part of each employment contract. Clocking-in system is in place. Records are on hand. Overtime is voluntary and due to the shift system is very limited.<br><br>Annual leave is paid, and an additional monthly salary is paid on top of the regular salary. Work on public holidays is paid with a 100% premium and time off. |
| 10.9a-b Informing Workers of Rights | Conformance | As confirmed by interviews with Workers and Human Resources management during the Audit, the Entity's Workers are informed about Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the Code of Conduct. Local law requires the minimum working conditions for Workers to be posted and available to Workers. Additionally, the Works Council informs Workers on their Labour Rights. |
| 11. OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Management System | Conformance | The Entity has implemented an Occupational Health and Safety (OH&S) Management System and holds a valid ISO 45001:2018 certificate, available at: https://alu-met.com/downloads/#Zertifikate<br><br>The latest audit report from the accredited certification body did not identify any non-conformities. |
| 11.1b-e Occupational Health and Safety (OH&S) | Minor Non-Conformance | The Entity is ISO 45001 certified and the effectiveness of the OH&S Management System is reviewed annually. Leading and lagging OH&S performance indicators are regularly monitored. A comparative |

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| Management System - Reviews and disclosure | | analysis of performance and lagging OH&S performance indicators are disclosed in the addendum to the Sustainability Report at: https://alu-met.com/wp-content/uploads/2026/01/Alu-met_Nachhaltigkeit_ASI_Anhang-zum-Nachhaltigkeitsbericht-2022-2023.pdf<br><br>However, leading performance indicators are not publicly disclosed. |
| 11.2 Employee engagement on Health and Safety | Conformance | The Entity has established mechanisms to discuss OH&S issues with the management and Workers (meetings between worker representatives, and appointed safety representatives from the workforce. (Sicherheitsbeauftragt and a joint Health and Safety committee). |

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## DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE | NOTES |
|---|---|---|
| 0 | 5 January 2021 | Initial Certification Audit (Provisional Certification) |
| 1 | 4 August 2021 | Surveillance Audit |
| 2 | 28 February 2022 | Surveillance Audit – Full Certification |
| 3 | 15 November 2024 | Surveillance Audit |
| 4 | 11 March 2025 | Re-Certification Audit and Scope Change – Provisional Certification |
| 5 | 23 April 2026 | Surveillance Audit – Full Certification |