ASI CERTIFICATION
PERFORMANCE STANDARD

PRESENTED TO

REAL ALLOY GERMANY GmbH: ALL PLANTS (GREVENBROICH, DEIZISAU, TÖGING) AND EUROPE HQ

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITOR
135	PERFORMANCE STANDARD (V2 2017)	FULL CERTIFICATION	TÜV RHEINLAND CERT GmbH

DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
8 JULY 2021	7 JULY 2024	8 JUNE 2021

AUTHORISED BY

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

CERTIFICATION SCOPE

Recycling of aluminium scrap and production of wrought and foundry alloys according to customer specification at Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by REAL ALLOY Europe Headquarters in Grevenbroich (Germany).

SUMMARY AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	REAL ALLOY
ENTITY NAME	REAL ALLOY GERMANY GmbH: All plants (Grevenbroich, Deizisau, Töging) and Europe HQ
CERTIFICATION SCOPE	Recycling of aluminium scrap and production of wrought and foundry alloys according to customer specification at Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by REAL ALLOY Europe Headquarters in Grevenbroich (Germany).
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses
ASI STANDARD	• Performance Standard V2
AUDIT TYPE	• Initial Certification Audit (21 – 22 April 2021) • Scope Change Audit (17 January – 2 June 2022) • Scope Change Audit (27 October – 3 November 2022)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	• 21 – 22 April 2021 (Initial Certification Audit) • 17 January – 2 June 2022 (Scope Change Audit) • 27 October – 3 November 2022 (Scope Change Audit)
AUDIT REPORT SUBMISSION	• 21 May 2021 (Initial Certification Audit) • 28 July 2022 (Scope Change Audit) • 22 December 2022 (Scope Change Audit)
AUDIT SCOPE	<u>Initial Certification Audit (21 – 22 April 2021)</u> The audit scope included the production and all operations at REAL ALLOY Germany Deizisau plant and central functions driven and directed from the REAL ALLOY Europe Headquarters in Grevenbroich (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 (April 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 environmental and social criteria.

Scope Change Audit (17 January – 2 June 2022)

The audit scope included the production and all operations at REAL ALLOY Deizisau plant (Germany) and Grevenbroich plant (Germany). Several functions (including integrated management system, Human Resources, procurement, technology, IT) are driven and directed from the REAL ALLOY Europe Headquarters in Grevenbroich (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. The audit has been undertaken as a combined desktop and on-site exercise consistent with the Entity's overall maturity level, audit type and previous conformance ratings.

Scope Change Audit (27 October – 3 November 2022)

The audit scope included the production and all operations at REAL ALLOY Töging (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. The audit has been undertaken as a combined desktop and on-site exercise consistent with the Entity's overall maturity level, audit type and previous conformance ratings.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

	☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	8 July 2021 – 7 July 2024
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	7 July 2024
CERTIFICATE NUMBER	135

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard legal compliance requirements. The General Manager has overall responsibility for legal compliance. There are systems implemented (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 to ensure compliance with Applicable Law: https://www.realalloy.com/eu/downloads/certificates# Finances are audited annually by an external financial auditing firm.
1.2 Anti-Corruption	Conformance	The Entity has issued an Anti-Corruption guideline and communicated it internally and externally, accessible at: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/code/REAL_ALLOY_Code_of_Conduct_and_Ethics.pdf Additional training is provided for 'at risk' personnel (e.g., sales and purchasing).
1.3 Code of Conduct	Conformance	The Entity's Parent Company has issued and communicated its Code of Conduct in both English and German, accessible at: https://www.realalloy.com/eu/downloads/code-of-conduct-and-ethics#
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has issued and communicated internally and publicly a company Policy statement addressing environmental, health and safety and governance aspects. The social aspect is addressed in the Group Code of Conduct and Ethics. These documents can be accessed from the REAL ALLOY Europe website: https://www.realalloy.com/eu/downloads#
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard, as well as their Environmental and Health and Safety Management System, there is senior management endorsement and support through provision of resources and regular review of the Policies. The Entity has established a Sustainability Committee and a manager is in charge of the implementation and effectiveness of the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated REAL ALLOY Europe's Policy and Code of Conduct both internally (intranet) and externally as appropriate. The documents can be accessed at: https://www.realalloy.com/eu/downloads#
2.2 Leadership	Conformance	The Entity's Director for Human Resources, Non-Metal Purchasing, Information Technology, Sustainability & Management Systems has the ultimate responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the Standard. This role is supported by the Head of Sustainability & Management Systems as ASI representative for REAL ALLOY Europe.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Integrated Management System, with a certified environmental component to ISO 14001:2015 (environment) and ISO 50001:2018 (energy). There are no overdue open actions from the latest audit report.
2.3b Environmental and Social Management Systems (social)	Conformance	The Social Management System is not yet fully formalised to the same extent as the system for environment (for this facet the Entity holds certificates according to ISO 14001 and ISO 50001) and for Occupational Health and Safety (the Entity also holds a certificate according to ISO 45001). However, issues relating to Human and Labour Rights are systematically managed. The certificates can be accessed at: https://www.realalloy.com/eu/downloads/certificates#
2.4 Responsible Sourcing	Conformance	REAL ALLOY Europe has issued and made publicly available their Sourcing Policy, accessible at: https://www.realalloy.com/eu/downloads/sustainability#
2.5 Impact Assessments	Conformance	A procedure specifying how to manage larger projects has been implemented. Since the Entity's Parent Company joined ASI, there have been no projects ongoing, which required the Entity to assess cultural and Human Rights impacts.
2.6 Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans, in collaboration with relevant stakeholders including the local fire brigade. The Entity also holds ISO 14001 and ISO 45001 certificates which are current to the Entity's

CRITERION	RATING	COMMENT
		Certification Scope under the ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	A process has been defined to manage mergers and acquisitions (M&As), should it become relevant. M&As are managed centrally. In a public announcement on 21 February 2022, Speira (also an ASI member) has communicated that they will acquire the Entity. The duty to review environmental, social and governance issues in the Due Diligence process for this transaction lies with Speira.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity 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 implemented systems to manage this effectively. Provisions for closing a site are regulated in the respective operating permits. A formal procedure has been drafted. The management at Headquarters has the ultimate responsibility for closure and decommissioning, rather than the Entity. As confirmed by management interviews, there are no plans for closure or decommissioning.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The REAL ALLOY Europe Group has issued its Sustainability Report 2020 to report on its governance approach and its material environmental, social and economic impacts for the Entity. For Töging, an addendum has been added to the website to provide site-specific environmental data. The report is available on the Group's website: https://www.realalloy.com/eu/downloads/sustainability#
3.2 Non-compliance and liabilities	Conformance	The Entity's Group has publicly disclosed information about fines in the Sustainability Report - refer to the Leadership section, page 8: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/sustainability/REAL_ALLOY_Europe_Sustainability_Report_2020.pdf As confirmed by management, there were no material fines or similar paid in the reporting period or the current year of this audit.
3.3a Payments to governments (legal and contractual)	Conformance	According to the Entity's tax auditor's report 2021, as well as confirmed by management, all payments to governments were made on a legal and/or contractual basis.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established a mechanism to receive and manage grievances and complaints from stakeholders. Workers can direct their grievances confidentially to an external specialised company. Due to the size and nature of the business, internal and external stakeholders can also easily reach top management directly. This process is being incorporated into a formalised procedure. Contact can be made via: https://www.realalloy.com/eu/#contact
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life cycle data is available regarding CO_2. REAL ALLOY Europe is involved in a project of the European Aluminium Association for a sector specific LCA: https://european-aluminium.eu/media/3315/2021-11-16_european-aluminium_environmental-profile-report-for-the-aluminium-refining-industry_executive-summary.pdf The scope of this assessment is gate-to-gate and it is not specific to the Entity. Carbon footprint data (Scopes 1 and 2) per tonne of average product is available for the Entity's three plants.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Not Applicable	As confirmed by the Entity's management, customer requests regarding cradle-to-gate LCAs were not raised prior to the audit. Therefore, currently this Criterion is not applicable.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	This Criterion is not applicable to the Entity, as the Entity has not publicly communicated on LCA.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity, as the production of liquid Aluminium does not generate Aluminium scrap. Therefore, there is no need for a target for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion does not apply to the Entity, as due to the nature of the business (liquid Aluminium), there is no scrap generated.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a recycler and remelter of Aluminium, the Entity has the clearly defined strategy to maximise the use of

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		scrap. Management is monitoring the status of implementation of the strategy periodically. However, as the Entity's products are ingots and liquid Aluminium, the End of Life comes at the clients' casthouses. Therefore, the Entity is less directly involved than producers of parts and products.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with the European Aluminium Association (EA) and actively works in EA's Sustainability Committee; part of its activities include enhancing collection and recycling of End of Life products. As a recycler, the Entity works with multiple partners to secure Aluminium scrap as input to their production process.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has implemented and maintains an energy management system according to ISO 50001:2018 (certificate valid until 12 Nov 2022): https://www.realalloy.com/eu/downloads/certificates# The Entity does account for and publicly discloses material GHG emissions and energy use by source on an annual basis, see the Real Alloy Sustainability webpage, sections 'Special: Deizisau', 'Special: Grevenbroich' and 'Special: Töging': https://www.realalloy.com/eu/sustainability#,
5.2 GHG emissions reductions	Conformance	The Entity has published its GHG reduction targets (20% reduction 2010 – 2025) in the Sustainability Report 2020, page 14: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/sustainability/REAL_ALLOY_Europe_Sustainability_Report_2020.pdf The Entity holds an ISO 50001 certification and objectives, targets and action plans have been established.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		

CRITERION	RATING	COMMENT
6.1 Emissions to Air	Conformance	The Entity has made their Emissions to Air publicly available in the Group's Sustainability Report 2020, page 20: https://www.realalloy.com/eu/downloads/sustainability# Minimisation plans are established as part of the Entity's ISO 14001 and ISO 50001 certification.
6.2 Discharges to Water	Conformance	At Deizisau, process effluents are discharged and treated in a publicly owned wastewater treatment plant. Stormwater is discharged to the adjacent Neckar river. At Grevenbroich, wastewater is discharged to the Speira system, which has its own treatment facilities before discharging to the Erft River. (Spiera also hold ASI Performance Standard Certification.) At Töging, water is discharged to the local river (Inn Kanal). Quantitative data is provided in the Sustainability Report 2020, page 20: https://www.realalloy.com/eu/downloads/sustainability# Site-specific data are publicly available on the website, refer to the sections 'Special: Deizisau', 'Special: Grevenbroich' and 'Special: Töging'.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has performed periodic risk assessments and implemented prevention measures on material leakages to air, water and soils. The risk assessments are part of the Entity's ISO 14001 certification.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Following the completion of risk assessments, and as part of the Environmental Management System, the Entity has developed and implemented external communication plans, compliance controls and a monitoring programme to prevent and detect Spills or Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has publicly disclosed information about Spills in the Sustainability Report 2020, page 17: https://www.realalloy.com/eu/downloads/sustainability# The Group did not experience any significant spills of oil, diesel, or other water endangering liquids to sewage systems or water bodies in 2020. Internal data indicate that there were no material Spills in 2021 and 2022 (up to the time of the audit).
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is currently not applicable to the Entity, as there have been no significant Spills since the

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		Entity joined ASI. Also, there are no previous cases known. Still, the Entity reports about this fact in the group's Sustainability Report 2020, page 17: https://www.realalloy.com/eu/downloads/sustainability#
6.5a Waste management and reporting (strategy)	Conformance	Document review, site tour and interviews confirmed the Entity has managed its wastes in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed its annual Waste quantities in the Group's Sustainability Report 2020, page 20: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/sustainability/REAL_ALLOY_Europe_Sustainability_Report_2020.pdf Site-specific data are publicly available on the website, refer to the sections 'Special: Deizisau', 'Special: Grevenbroich' and 'Special: Töging': https://www.realalloy.com/eu/downloads/sustainability#
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross generated by the Entity is being collected. At Grevenbroich and Töging, Dross is recycled internally. At Deizisau, Dross is sent to the Entity's 'sister' site Töging for recycling.
6.8b Dross (recycling)	Conformance	All Dross from production is being recycled. At Grevenbroich, Dross is recycled internally. At Deizisau, Dross is sent for recycling to the Entity's sister site Töging. Quantities are recorded. Note: The 'German Recycling Management Act' (KrWG) prohibits the landfilling of Dross.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable, as (in line with local legislation) 100% of the Dross is gathered and recycled, as confirmed by document review, interviews and a site tour.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's process and sanitary water intake is exclusively sourced from municipal water supplies. It is metered and documented in an annual consumption report (invoice). At Töging, cooling water is taken from the local river (Inn Kanal). The annual quantity is reported in the Sustainability Report 2020. Site-specific data are publicly available on the website, refer to the sections 'Special: Deizisau', 'Special: Grevenbroich' and 'Special: Töging': https://www.realalloy.com/eu/downloads/sustainability#
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the water-related risks in Watersheds in the Entity's Area of Influence. The assessment concluded that relevant risks to Watersheds, which might be caused by the Entity, are not present.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as the water risk assessment did not identify a material risk that requires management.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the Entity rated all assessed risk to Watersheds as low.
7.3 Disclosure of water usage and risks	Conformance	The Entity publicly reports its water use in the Group's Sustainability Report 2020, refer to the sections

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		'Special: Deizisau', 'Special: Grevenbroich' and 'Special: Töging': https://www.realalloy.com/eu/downloads/sustainability#
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has as part of the approvals process for Deizisau, undertaken an environmental impact assessment that includes biodiversity. The Grevenbroich and Töging sites have been active for more than 100 years in an industrial zone and no material biodiversity risks have been identified.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, because the biodiversity assessment did not indicate the need for action as material risks were not identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, because the biodiversity assessment did not indicate the need for action as material risks were not identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable to the Entity, because the biodiversity assessment did not indicate the need for action as material risks were not identified. Note: The production sites are situated in an industrial zones, as defined by the respective community.
8.3 Alien Species	Conformance	Scrap and other input materials of the Entity are, in the large majority, sourced regionally (i.e., Germany and central Europe). During the Entity's thermal processing of the Aluminium scrap, all species that may be present in the scrap are destroyed.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has issued and communicated its Code of Conduct, which includes a commitment to respect

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		Human Rights. The Code can be accessed via the following link, refer page 7: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/code/REAL_ALLOY_Code_of_Conduct_and_Ethics.pdf Human Rights are also addressed in the group's Supplier Sustainability Guideline: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/terms-and-conditions/REAL_ALLOY_Supplier_Sustainability_Guideline.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a documented Human Rights Due Diligence assessment based on the approach of the Danish Institute for Human Rights. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews of workers and management during the audit.
9.1c Human Rights Due Diligence (remediation)	Conformance	As confirmed by workers and management and according to the Human Rights Due Diligence assessment, the Entity has no salient adverse Human Rights impacts present. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, remediation activities are not required.
9.2 Women’s Rights	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women’s rights requirements. During the site tour, interviews and document review, no indication for deliberate Discrimination of women was identified.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity’s area of influence are not directly affected by the Entity's operations.

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9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion does not apply to the Entity, as no resettlements are being considered or are taking place during the period since joining ASI or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply to the Entity, as no resettlements are being considered or are taking place during the period since joining ASI or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Not Applicable	This Criterion does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.7b Local Communities (impacts)	Not Applicable	This Criterion does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has an established process to identify Conflict-Affected and High-Risk Areas (CAHRAs) and has assessed their suppliers accordingly. No contribution to armed conflict or Human Rights abuses in CAHRAs has been identified.
9.9 Security practice	Conformance	The Entity does not employ armed security forces. The sites do not operate in a Conflict-Affected and High-Risk Area.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity is committed to respecting the Workers' Freedom of Association. The Entity has a freely elected Workers council (Deizisau has 5 members, Grevenbroich has 9 and Töging has 7).
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the Workers' right to Collective Bargaining. Collective Bargaining Agreements exist on national level, negotiated with the industry wide union (IG BCE).

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10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Germany, the country in which the Entity operates, Applicable Law does neither restrict the right to Freedom of Association nor Collective Bargaining. The industry wide collective agreement of the foundry industry is applied. The Entity has an open position on employee representation.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker was over 18 years.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers may be employed for educational purposes only. If at all, work with hazardous substances only occurs under supervision and as part of vocational education. At the time of the audit, the youngest Worker was over the age of 18 years.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use, nor support the use of Child Labour and does not engage in or support Worst Forms of Child Labour. At the time of the audit, the youngest Worker was over the age of 18 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking, either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers, neither directly nor through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require migrant Workers to lodge deposits or security payments, neither directly nor through employment or recruitment agencies, as confirmed by worker interviews.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not hold Workers in Debt Bondage nor force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not unreasonably

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		restrict the freedom of movement of Workers in the workplace. The site does not employ any armed security staff.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. Only copies of driver's licences, passports and other certificates are kept in the personnel files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and communicates this commitment publicly in its Code of Conduct, refer page 1: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/code/REAL_ALLOY_Code_of_Conduct_and_Ethics.pdf As confirmed by interviews and document review, the Entity does not engage in or support Discrimination.
10.5 Communication and engagement	Conformance	The Entity has open communication and direct engagement with Workers. Nominated workers act as Safety Representatives (Sicherheitsbeauftragte), a joint Health and Safety Committee is established and an anonymous letterbox for raising suggestions or concerns is available. Workers meet daily with their superiors to discuss work related issues. The Entity practices an 'open door' policy. Works council members regularly meet with local and senior management.
10.6 Disciplinary practices	Conformance	As confirmed by interviews, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers as mentioned in the requirements of this Criterion.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Wages are prescribed according to the industry wide Collective Bargaining Agreement and is always substantially above the national minimum wage.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employees' bank accounts and pay slips

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		are provided to employees, which are detailed and understandable.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and is part of each Employment Contract. A 'clocking-in' system is in place and records are available. Overtime is voluntary and due to the shift system very limited. The average Working Time of production workers does not exceed 40 hours per week.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated its Policy, including Occupational Health and Safety (OH&S): https://www.realalloy.com/fileadmin/user_upload/eu/downloads/policy/RAEU_Policy_EN_01.pdf However, two other documents (OHS Manual and the group's Sustainability Report) are used to address the right of Workers to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work, as these two topics were not expressly mentioned in the policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies the Policy to all Workers and Visitors present in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented and communicated its Policy, which includes a commitment to comply with all legal requirements.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Interviewed Workers confirmed that they have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. The Policy statement addresses OH&S, however it does not specifically confirm the authority of Workers to refuse or stop unsafe work: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/policy/RAEU_Policy_EN_01.pdf Until the next revision of the Policy, the authority of Workers to refuse or stop unsafe work has been confirmed in the 2020 Sustainability Report, refer page 7: https://www.realalloy.com/fileadmin/user_upload/eu/downloads/sustainability/REAL_ALLOY_Europe_Sustainability_Report_2020.pdf

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11.2 OH&S Management System	Conformance	The Entity has implemented an Occupational Health and Safety Management System and gained ISO 45001:2018 certification by an accredited certification body. The audit did not identify any non-conformity. The certificate can be accessed at: https://www.realalloy.com/eu/downloads/certificates#
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented mechanisms to discuss Occupational Health and Safety issues with management. Safety representatives from the workforce ("Sicherheitsbeauftragte") appointed and a joint Health and Safety Committee meets quarterly.
11.4 OH&S performance	Conformance	Health and safety statistics (including leading and lagging indicators) are monitored on a monthly basis by the Entity's management.

Document Control and Version History

Revision	Date	Notes
0	8 July 2021	Initial Certification Audit (Full Certification)
1	25 August 2022	Scope Change Audit to include Grevenbroich site.
2	9 February 2023	Scope Change Audit to include Töging plant.