

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

REAL ALLOY HOLDING, LLC

CERTIFICATE
NUMBER

294

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

23 JUNE 2023

DATE OF EXPIRY

22 JUNE 2026

CERTIFIED SINCE

23 JUNE 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a white background.

Aluminium Stewardship Initiative Ltd
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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 cast alloys according to customer specifications at 11 production facilities located in Canada, the United States of America (USA) and Mexico. The facilities are Chicago Heights (IL, USA), Friendly (WV, USA), Goodyear (AZ, USA), Loudon (TN, USA), Mississauga (ON, CA), Monclova (Coah., MX), Morgantown (KY, USA), Post Falls (ID, USA), Sapulpa (OK, USA), Wabash Specification (IN, USA), and Wabash Recycle (IN, USA), plus central strategic and administrative functions managed by Real Alloy headquarters in Beachwood (OH, USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	REAL ALLOY
ENTITY NAME	Real Alloy Holding, LLC
CERTIFICATION SCOPE	Recycling of aluminium scrap and production of wrought and cast alloys according to customer specifications at 11 production facilities located in Canada, the United States of America (USA) and Mexico. The facilities are Chicago Heights (IL, USA), Friendly (WV, USA), Goodyear (AZ, USA), Loudon (TN, USA), Mississauga (ON, CA), Monclova (Coah., MX), Morgantown (KY, USA), Post Falls (ID, USA), Sapulpa (OK, USA), Wabash Specification (IN, USA), and Wabash Recycle (IN, USA), plus central strategic and administrative functions managed by Real Alloy headquarters in Beachwood (OH, USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (18 April – 17 May 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">18 April – 17 May 2023 (Initial Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 June 2023 (Initial Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 April – 17 May 2023)</u></p> <p>The audit scope includes recycling of aluminium scrap and production of wrought and cast alloys according to customer specification at the following facilities Friendly (WV, USA), Loudon (TN, USA), Mississauga (ON, CA), Morgantown (KY, USA), Wabash Specification (IN, USA) including the Real Alloy head office at Beachwood (OH, USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses

The ASI multi-site sampling approach was undertaken for the sites listed. All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification
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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.
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CERTIFICATION
PERIOD

23 June 2023 – 22 June 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

23 June 2025

CERTIFICATE
NUMBER

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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity ensures Compliance with Applicable Law by maintaining a legal department and implementing monitoring mechanisms at the facility level. Methods to maintain awareness include membership in industry groups like the Aluminum Association and subscriptions to function-specific newsletters in issues including Human Resources and Health, Safety, and Environmental.
1.2 Anti-Corruption	Conformance	The Code of Conduct addresses Anti-Corruption and Bribery and is communicated to all employees during the onboarding process. It also covers gifts and entertainment that can be given to or received by Employees. In that case, the legal department can be consulted. A hotline is available to all personnel to inform the legal department of any witnessing or suspicions of wrongdoings. The Code of Conduct and Ethics is available at: https://realalloy.com/wp-content/uploads/2022/06/Code_of_Conduct_English_only_.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct and Ethics including principles relevant to environmental, social and governance performance and requirements. It is communicated among a list of policies during the employee onboarding process and posted in the workplace. https://realalloy.com/wp-content/uploads/2022/06/Code_of_Conduct_English_only_.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented various stand-alone policies, including, but not limited to Health, Safety, Environment and Quality (HSEQ) Policy, Anti-Discrimination and Anti-Harassment Policy, Code of Conduct, Workplace Discrimination Harassment Violence Policy (Canada) and Supplier Sustainability Policy.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management is aware of, and endorses corporate policies related to the Code of Conduct and Ethics, Anti-Discrimination, and other labour rights related policies as well as Health, Safety, and Environmental and Violence Policies.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>All policies are communicated to all employees during the onboarding process. The Code of Conduct and Ethics, Anti-Discrimination Policy, Health and Safety, Environmental and Quality Policy and other relevant policies are also posted in the workplace and available to Stakeholders on request. The Supplier Sustainability Policy, Code of Conduct and Health and Safety, Environmental and Quality Policy are available at: https://realalloy.com/downloads</p>
2.2 Leadership	Conformance	<p>The Entity has established a Real Alloy Sustainability Procedure, where the Corporate Sustainability Manager is responsible for the overall control, distribution, implementation, and ongoing enforcement of this procedure and compliance with the ASI Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity's Health Safety Environmental Management Process describes the different procedures, policies, and documentation of the Environment Management System (EMS). All facilities have completed an environmental risk assessment including actual and potential measures of controls identified to mitigate environmental impacts and improve their performances. Several control measures have been implemented including housekeeping, Work Instructions, maintenance activities, management plans, training, and awareness.</p> <p>Each facility has a strategic action plan implemented to identify and plan actions to improve environmental performance and reduce impacts and to ensure all monitoring and reporting activities are performed according to legal and internal requirements. Corporate Health and Safety and Environmental internal audits are undertaken regularly for all facilities.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has defined a risk-based social Management System in the Sustainability Procedure that includes documentation and reviews. A foundational risk assessment based on the UN Global Compact Self-Assessment tool has been performed to identify social impacts as well as actual and potential measures of controls.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity, as part of Real Alloy North America has implemented a Supplier Sustainability Policy detailing Environmental, Social, & Governance (ESG) expectations for suppliers. The Policy is</p>

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		<p>available at: https://realalloy.com/wp-content/uploads/2022/06/Real_Alloy_NA_Supplier_Sustainability_Policy-2.pdf</p> <p>A risk assessment for suppliers of material and Recyclable Scrap Material based on annual spent volume. Any risks identified will be reviewed with business leadership to determine appropriate mitigation actions. Factors considered in the risk assessment include the origin of the material, suppliers, type of material, value of the transaction and unusual circumstances.</p> <p>However, the risk assessment had not been completed for all types and tiers of suppliers.</p>
2.5 Impact Assessments	Conformance	<p>In its sustainability procedure, the Entity has a defined Impact Assessment for major projects. This procedure establishes that an environmental, social, cultural and Human Rights Impact Assessment must be performed for any New Projects or changes to facilities using the Management of Change processes (MOC). The UN Global Compact Self-Assessment is also used as a guide, with reference to the UN Global Compact Guide to Human Rights Impact Assessment and Management.</p> <p>At the time of the audit, no Major Changes took place in the last twelve months.</p>
2.6 Emergency Response Plan	Conformance	<p>Each facility has its own specific Emergency Action Plan that describes different scenarios relevant to their activities and installations. Emergency Action Plans contain requirements regarding responsibilities, training, emergency procedures, equipment and communication with local emergency services, employees and other Stakeholders, as necessary.</p> <p>Each facility has also developed Spill Prevention, Control and Countermeasures Plan (SPCC) and Environmental Emergency Plan, as required by the applicable federal regulations.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has implemented a management of change process that identifies any environmental, health and safety and social impacts in case of major projects. A complete Due Diligence exercise that identifies those impacts is performed for any acquisition or merger by the legal department.</p> <p>At the time of the audit, no acquisition or merger activity had occurred in the past year.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>In the case of any closure, decommissioning or divestment, the Entity will review ESG issues as part</p>

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		of the management of the change process. The process involves a cross-functional team including operations, Health, Safety, and Environment (HSE) and legal. This process is described in the Sustainability Procedure for Closure, Decommissioning and Divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity discloses its governance approach and environmental, social and economic impacts through an annual Sustainability Report. The report is available at: https://realalloy.com/downloads
3.2 Non-compliance and liabilities	Conformance	Any significant fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law will be disclosed publicly, either through the Sustainability Report or other means, as described in the following procedure. https://realalloy.com/wp-content/uploads/2023/04/REAL_ALLOY_Sustainability_Report_2022-1.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity will only make legal or contractual payments to governments. This is detailed in the 'Corruption and Bribery' section of the Code of Conduct and Ethics. Health and safety and environmental fines and notices of violations are tracked by senior management and recorded.
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's complaint resolution mechanisms are described in the Sustainability Procedure and can take different forms based on the type of Stakeholder, both internal and external. All site phone numbers, and a general contact email address are available on the website at: https://realalloy.com/contact and https://realalloy.com/about-real-alloy/#locations Any complaints or grievances from external Stakeholders are recorded and directed internally to the appropriate leadership level.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity uses the Life Cycle Assessment (LCA) work completed by the Aluminum Association, which details many aspects of the Aluminium value chain. This includes The Environmental Footprint of Semi-Fabricated Aluminium Products in North America

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		published in 2022 that uses the Recycled content approach (i.e., cut-off approach).
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed a tool to calculate the cradle-to-gate LCA of carbon impacts of a specific product. That consists mostly of the production impacts, as Aluminium scrap is brought in as starting a new 'cradle'.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Sustainability Report includes a reference to the LCA completed by the Aluminum Association, with information on how to access the LCA. https://realalloy.com/downloads
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity implements efforts to minimise the generation of scraps as it is the nature of its activity. All scrap produced is recycled back into our processes with other Aluminium scrap purchased from customers. Aluminium alloy scrap or nonconforming material is remelted. The Entity has also implemented initiatives to recover Aluminium from Dross through milling, screening, and other treatments.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	As a recycler, alloy separation is fundamental to the Entity. Work Instructions for identification and traceability are implemented at each facility. Aluminium alloys are physically separated by grade, material type, both or event by specific customers depending on their requirements, on the raw materials and finished goods sides of production.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	By the nature of its business, the Entity is engaged with customers and regional collection systems to support the recycling of Aluminium scrap, Dross, and the maximum recovery of other alloys. The business and recycling strategy includes activities and time-bound targets to ensure growth through recycling activities.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is a member of the Institute of Scrap Recycling Industries (ISRI) and the Aluminum Association (AA), which promote the recycling of Aluminium. As a recycler, the Entity is a component of the regional and national recycling system. The Entity has partnered with the Aluminum Association for marketing videos which promote Aluminium recycling as a sustainable solution. The Entity is

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		engaged with scrap aggregators to purchase Aluminium scraps of all kinds such as pre-and post-consumer materials.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for all Material Greenhouse Gas (GHG) emissions and energy use (Scope 1 and 2), by sources, on an annual basis. These data include details on each facility, the total equivalent CO ₂ emission as well as the CO ₂ intensity by tons of Aluminium produced, and is publicly disclosed in the Sustainability Report: https://realalloy.com/downloads
5.2 GHG emissions reductions	Conformance	The Entity has set time-bound targets for the reduction of Direct and Indirect GHG Emissions (Scope 1 and 2). Targets are reviewed at least annually against customer and regulatory needs and adjusted as needed. These targets are included in the Sustainability Report: https://realalloy.com/downloads
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		
6.1 Emissions to Air	Minor Non-Conformance	Each facility has identified their Emissions to Air that have adverse effects on humans and the environment based on local and national regulation requirements. All sites have established emission rates based on historical stack testing and/or material charges in furnaces and other activities and most facilities have quantified and reported them based on local and/or national regulatory requirements. However, there is no evidence that all facilities have quantified and reported their Emissions to Air and that all those are reported and publicly available. Plans are developed at the site level in environmental aspect risk assessment to minimise adverse impacts and remain compliant with Applicable Law which includes maintenance of critical equipment, dust control process,

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		<p>housekeeping, periodic monitoring, and equipment replacement projects.</p> <p>The Loudon facility Emissions to Air are available through the Tennessee DAPC website (accessible only within the USA): https://dataviewers.tdec.tn.gov/dataviewers/f?p=19031:34051:::34051:P34051_PERMIT_ID:86425</p> <p>The Wabash facility Emissions to Air are available through Indiana Virtual File Cabinet here (accessible only within the USA): https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83335801&dDocName=83337606&Revision=web&allowInterrupt=1&noSaveAs=1</p>
6.2 Discharges to Water	Conformance	<p>Any Discharges to Water that may have adverse effects on humans, or the environment are quantified and compiled in the 2022 Sustainability Metrics - Water and Waste. The reporting on water discharges is included in the Sustainability Report: https://realalloy.com/downloads</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>Each facility reviews their significant environmental aspect risk assessment to identify their major Spills and Leakage locations.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>Methods to respond to Spills or Leakages are detailed in the specific Emergency Action Plans of each facility. Drills and training, spill kits and other emergency equipment, impacted areas and parties, monitoring, procedure reviews and responsibilities are among the topics defined in those plans. Spill Prevention Control and Countermeasures of each US site (SPCC) are established and implemented as required by US federal regulations. The Canadian plant implements an Environmental Emergency plan for its propane storage tank, as required by Canada's federal regulations.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity describes Spill reporting in its Sustainability Procedure. It states that it will disclose the volume, type, and potential impact of significant Spills to affected parties immediately through the usual communication channel, depending on the type of affected parties. All Spills and releases are recorded and directed internally to the Corporate Manager for review.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Impact Assessments of Spills and any subsequent remediation actions undertaken are disclosed publicly on an annual basis in the Sustainability Report: https://realalloy.com/downloads</p>

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6.5a Waste management and reporting (strategy)	Conformance	The Sustainability Procedure defines the Waste Mitigation Hierarchy that is used for waste management by all facilities. Each plant has inventoried their waste streams and the disposal method and general storage and handling requirements for each of them. A Waste Disposal Matrix is also used to identify the waste stream and the average volume for each stream.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity has quantified the Hazardous and Non-Hazardous Wastes generated and is publicly disclosed within the annual Sustainability Report: https://realalloy.com/downloads However, it was identified the associated disposal methods of generated wastes are not publicly disclosed and not all waste generated by facilities was accounted for in the 2022 Sustainability report.
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 (start 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.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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6.8a Dross (recovery)	Conformance	Dross treatment is a component of the Entity's recycling system and the services provided to its customers. Where possible, Dross and salt cake are processed to maximise the recovery of Aluminium and minimise waste.
6.8b Dross (recycling)	Conformance	All Dross generated by the Entity remelting operations is reprocessed within their facilities through milling, shredding, screening, and remelting operations to obtain salt cake and other mill fractions.
6.8c Dross (review of alternatives)	Conformance	The landfill process and alternatives for salt cake are regularly reviewed. All Dross residues are quantified and recorded, both to landfill and to mills for recovery.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's production facilities have identified and mapped water withdrawal and use, by sources and type. Water usage is tracked monthly by each facility's controller. Water is only used for process purposes is for finished products cooling systems.
7.1b Water assessment (risk assessment)	Conformance	Water-related risks for Watersheds in each facility's Area of Influence have been assessed as part of the environmental aspects and impact analysis. Water is sourced from municipal city water supplies. Water is only used for process purposes is for finished products cooling systems. Other uses include washrooms and dust control on roads.
7.2a Water management (management plans)	Conformance	Site-specific risk assessments and water mapping demonstrate that water-related risks as not significant, therefore water management plans with time-bound targets are not required.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the Entity's site-specific risk assessment and water mapping demonstrate that water-related risks as not significant, therefore water management plans with time-bound targets are not required.
7.3 Disclosure of water usage and risks	Conformance	Water withdrawal quantified by each facility and use are publicly disclosed within the annual Sustainability Report: https://realalloy.com/downloads There are no Material water-related risks identified and assessed. If a material risk is identified in future, it will be reported in the annual sustainability report as well.

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PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity's Sustainability procedure describes that any Material impacts identified through the biodiversity assessment process will be addressed and monitored. The action plan will be designed in accordance with the Biodiversity Mitigation Hierarchy. No Material impact on biodiversity has been identified by the latest biodiversity assessments.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as no Material impact on biodiversity has been identified by the latest biodiversity assessments. However, the Entity has established a Sustainability procedure that describes that any Material impacts found through the biodiversity assessment process will be addressed and monitored. The action plan will be designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as no Material impacts on biodiversity have been identified by the latest biodiversity assessments undertaken in 2023.
8.2c Biodiversity management (reporting)	Conformance	No Material impacts on biodiversity have been identified by the latest biodiversity assessments performed in 2023. However, the Entity's Sustainability procedure describes that achieved biodiversity outcomes would be made publicly available through the Sustainability Report.
8.3 Alien Species	Conformance	The Entity, utilising support from a consulting firm, has conducted Biodiversity and Ecosystem Services Risk Assessment in 2023 that covers all facilities' Alien Species presence and risk of introduction from its activities. Only one low risk was identified, the introduction of Alien Species to the facilities. Best management practices are implemented to monitor and mitigate this risk.
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 operations)	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.

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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's Code of Conduct and Ethics incorporates a commitment to respect Human Rights. This Code is communicated to all employees during onboarding and posting in the workplace. A Supplier Sustainability Policy also defines Human Rights principles that suppliers are expected to follow. The Code of Conduct and Ethics and Supplier Sustainability Policy are available at: https://realalloy.com/downloads
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has defined a Human Rights Due Diligence process in the sustainability procedure. A risk and Impact Assessment has been completed using the UN Global Compact Self-Assessment and identifies actual and potential mitigation measures to address impacts. If a Material impact is identified, the Entity will cooperate in remediation through legitimate and defined processes.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Human Rights Self-assessment completed identify different measures of mitigation for different potential impacts. Any contribution or causation of adverse effect on Human Rights would be identified in this assessment, through the internal reporting system or the employee hotline and remediation actions would be established and recorded. The Sustainability Procedure defines that Entity would cooperate in remediation through legitimate and defined processes.
9.2 Women's Rights	Conformance	The Anti-Discrimination and harassment Policies of the Entity have included gender as a protected category from Discrimination or harassment. Different measures are implemented to ensure equality and respect for Women's Rights and interests in the workplace.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity, there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	One minor and potential cultural and sacred heritage locality has been identified on one of the

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		Entity's facility sites. Active and open communication with local historic organisations and other relevant stakeholders are in place to ensure the ongoing effective management of this locality. No other cultural or sacred sites are identified.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, no project with potential or actual resettlement had occurred in the past years and none are planned during the upcoming certification period. However, the Entity has established a change management process that identifies any social impacts in the case of major projects. A complete Due Diligence exercise would be undertaken by the legal department to identify potential resettlement or displacement due to any acquisition or merger.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, no project with potential or actual resettlement had occurred in the past years and none are planned during the upcoming Certification Period. However, the Entity has established a change management process that identifies any social impacts in the case of Major Projects. A complete Due Diligence exercise would be undertaken by the legal department to identify potential resettlement or displacement due to any acquisition or merger.
9.7a Local Communities (rights and interests)	Conformance	The Entity has defined a Human Rights Due Diligence process in the Sustainability Procedure. A risk and Impact Assessment has been completed using the UN Global Compact Self-Assessment and identifying different mitigation measures to address impacts on Local Communities and ensure respect for their livelihoods.
9.7b Local Communities (impacts)	Conformance	The Entity is located in an industrial area however it seeks to build relationships with Local Community Stakeholders, to help prevent and address adverse impacts by establishing open communication with external Stakeholders. Some facilities plan site visits for people from the community or other relevant Stakeholders.
9.7c Local Communities (livelihoods)	Conformance	The Entity's facilities engage with communities in a variety of methods and the Entity has established a Charitable Contribution and Sponsorship Policy to ensure that all charitable contributions, donations, and sponsorships are aligned with the corporate social responsibility and business goals.

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9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The countries in which the Entity does business are not considered as high-risk areas.</p> <p>The Supplier Sustainability Policy includes a requirement for all suppliers to not contribute to armed conflict or Human Rights abuses in CAHRAs. A risk assessment for major suppliers has been performed and no risk to Human Rights has been identified.</p>
9.9 Security practice	Conformance	<p>Some of the Entity's facilities have external private security providers. Security provider personnel are limited to guard duties, entry/exit truck scale management and asset protection. The contract covers ethics and non-Discrimination, and employees must comply with a handbook that includes best-recognised practices.</p> <p>Other facilities have established a written procedure in case of trespassing or other violent situations in the site's Emergency Action Plan that includes the involvement of local police departments as required.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has established a Code of Conduct and Ethics respecting Workers' rights to join or not join a union and where Workers are represented by a legally recognised union, a commitment to establish a constructive dialogue with representatives.</p> <p>Three of the facilities included in the scope have legally established unions.</p> <p>Interviews with Workers and union representatives demonstrated that no interference is made whatsoever from the Entity that sound dialogue is in place and that all Workers are free to join or not a union and no pressure is made from one side or the other.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Code of Conduct and Ethics contains a statement on dialogue with employee representation. Mississauga and Wabash sites have collective agreements in force that are negotiated periodically. Both unions are recognised.</p> <p>Interviews with Workers from all sites demonstrated that all Workers are free to collectively bargain.</p>

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable, as the Entity operates in Canada, the United States of America and Mexico only. Those three countries have laws that protect Freedom of Association for Workers.
10.2a Child Labour (minimum age)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery and prohibits the use of Child Labour. The minimum employment age is 18 and the application form used for employment allows for age verification. During site visits and interviews with Workers and Stakeholders, no Workers or contractor employee under 18 years old was witnessed nor was any presence of minors on site.
10.2b Child Labour (hazardous)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery and prohibits the use of Child Labour. The minimum employment age is 18 or older.
10.2c Child Labour (worst forms)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery and prohibits the use of Child Labour. The minimum employment age is 18 or older.
10.3a Forced Labour (human trafficking)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery. The Entity does not use recruitment or labour hire agencies. During site visits and interviews with Workers and Stakeholders, no Workers or contractor employees from recruitment or labour hire agencies are present and there is no indication of Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not take deposits from employees or contractors. This was confirmed during site visits and interviews with Workers and Stakeholders, no deposit or recruitment fees are asked during the hiring process.
10.3c Forced Labour (migrant workers)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery. No Migrant Workers are employed by the Entity as

CRITERION	RATING	COMMENT
		confirmed during the audit and interviews with Workers and Stakeholders.
10.3d Forced Labour (debt bondage)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery. During site visits and the interview with Workers and Stakeholders, no Debt Bondage was mentioned, and Workers do not have debt towards or, with the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery. Employees are free to access and leave the facilities at any time. This was confirmed during site visits and interviews with Workers and Stakeholders. The Non-Union Attendance Policy establishes rules regarding attendance at work.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity only asks candidates for copies of their official documents as was confirmed during site visits and the interview with Workers and Stakeholders.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Code of Conduct and Ethics prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of slavery. During site visits and interviews with Workers and union representatives, there were no issues identified regarding the freedom to terminate employment.
10.4 Non-Discrimination	Conformance	The Entity has established Anti-Discrimination Policies that apply to all Workers and set non-Discrimination mechanisms. Discrimination and harassment prohibition is stated in the Code of Conduct and Ethics, which is reviewed by all employees during orientation and is available at: https://realalloy.com/wp-content/uploads/2022/06/Code_of_Conduct_English_only_.pdf
10.5 Communication and engagement	Conformance	The Entity has implemented periodic meetings with employees to raise concerns. All concerns, issues or complaints raised by Workers are recorded and investigated if required. Employees are encouraged to speak up to direct supervisors, managers, or senior managers to raise any issue. A compliance hotline is in place for complaints and whistleblowing: www.realalloy.ethicspoint.com

CRITERION	RATING	COMMENT
		Issues raised are also addressed promptly when possible.
10.6 Disciplinary practices	Conformance	<p>The Entity has established two Anti-Discrimination policies that apply to all Workers and set anti-harassment mechanisms, which are in accordance with local labour regulations. A Disciplinary Procedure is established and applies to all employees. This procedure defines rules on employee conduct, performance and responsibilities and how verbal and written warnings, suspension or terminations for non-union Workers are managed.</p> <p>Collective agreements detail disciplinary practices for union Workers. No corporal, mental or physical punishment is used, nor any harassment or verbal abuses are tolerated.</p>
10.7a Remuneration (living wage)	Conformance	<p>Wages paid by the Entity are largely above the local minimum wages. Union Worker wages are set in their respective collective agreements and non-union Workers' wages are defined by established and documented scales that take into account several factors, including benchmarking from similar local employers.</p> <p>Salaries are established by Corporate via a series of documented grades that also take into account several factors, including benchmarking from similar local employers.</p>
10.7b Remuneration (method of payment)	Conformance	Each site has a paid frequency defined by local standards but never exceeds more than two weeks. Direct banking deposits are used, and wages are paid in local currency, which is the Canadian Dollar, US Dollar, or Mexican Peso.
10.8 Working Time	Conformance	<p>Office employees work a typical Monday to Friday for 40 hours per week.</p> <p>Plant Workers work on shift that depends on each facility's situation. Working Time for union Workers is set in collective agreements and non-union Workers work on twelve hour shifts that alternate from days on and days off. The Entity has established Paid Sick Leave Policy, Attendance Policy and Vacation Policy. Local public holidays and other labour laws are respected.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a documented Environment, Health, Safety and Quality (EHSQ) Policy communicated to all employees during the hiring process and

CRITERION	RATING	COMMENT
		<p>acknowledgement recorded in the Workbright platform. The Health, Safety, Environmental & Quality Policy is posted at several locations in the workplace and is available at: https://realalloy.com/wp-content/uploads/2022/06/Real_Alloy_HSEQ_Policy_.pdf</p> <p>The Health, Safety and Environmental Mission statement is also documented and signed by the CEO and Safety Director.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has established a Health, Safety, Environmental and Quality Policy that includes a statement specifying the Policy applies to all employees, contractors and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established a Health, Safety, Environmental and Quality Policy that includes a commitment to comply with all health and safety legal requirements as well as its standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented a Safe-or-Stop procedure throughout all its facilities. The Safe-or-Stop policy is communicated during the onboarding process to all employees.
11.2 OH&S Management System	Conformance	The Occupational Health and Safety (OH&S) Management System is defined in the Entity's Health and Safety Management Process document. The Management System includes a set of eight Environment, Health, and Safety (EHS) standards that address the main OH&S hazards. Training needs and planning are also defined through processes at different levels and all OH&S programs, standards and methods comply with state, province and federal regulations. Corporate Health and Safety and Environmental internal audits are performed regularly for all facilities.
11.3 Employee engagement on health and safety	Conformance	<p>Employees may engage in the OH&S system through a variety of committees and regular safety meetings.</p> <p>One facility has established specific awareness and communication mechanisms including as one-on-one meetings or reporting incentives. This allows employees to raise, discuss, and participate in the resolution of issues. During Workers' interviews, all employees stated that they comfortable raising OH&S issues and are aware of communication channels.</p>

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	<p>The Entity monitors several leading and lagging indicators such as risks assessments, corrective and preventive action follow-up, near-misses and reported Safe-or-Stops, safety training records, recordable injuries and illnesses rate (IIR) and days away Rate (DAWR).</p> <p>All indicators are reviewed and evaluated quarterly by Corporate as well as safety achievements. Improvement action plans can also be implemented to address specific performance issues.</p>

Document Control and Version History

Revision	Date	Notes
0	23 June 2023	Initial Certification Audit – Full Certification