ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Nemak Slovakia s.r.o.

CERTIFICATE NUMBER

360

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

15 MARCH 2024

CERTIFICATION LEVEL

CERTIFICATION

DATE OF EXPIRY

ASI ACCREDITED AUDITING FIRM

TÜV RHEINLAND CERT GmbH

CERTIFIED SINCE

15 MARCH 2024

AUTHORISED BY

CERTIFICATION SCOPE

industry, Slovakia.

For the production of Aluminium components for the automotive

J.

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Nemak S.A.B de C.V			
ENTITY NAME	Nemak Slovakia s.r.o.			
CERTIFICATION SCOPE	For the production of Aluminium components for the automotive industry, Slovakia.			
SUPPLY CHAIN ACTIVITIES	CasthousesMaterial Conversion			
ASI STANDARD	Performance Standard V3			
AUDIT TYPE	Initial Certification Audit			
AUDIT FIRM	TÜV Rheinland Cert GmbH			
AUDIT DATE	• 30 October – 3 November 2023			
AUDIT REPORT SUBMISSION	• 24 January 2024			
AUDIT SCOPE	The Audit Scope covered the Nemak Slovakia s.r.o. facility involved in the production of Aluminium components in Žiar nad Hronom, Slovakia.			
	Supply chain activities included in the Audit Scope:			
	Casthouses			
	Material Conversion			
	All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.			
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	15 March 2024 - 14 March 2027			
NEXT AUDIT TYPE	Surveillance Audit			

NEXT AUDIT DATE	15 September 2025
CERTIFICATE NUMBER	360
	If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <u>https://aluminium-stewardship.ethicspoint.com/</u> 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.
	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

Nemak is a provider of lightweighting solutions for the automotive industry specialising in the development and manufacturing of Aluminum components for powertrain, e-mobility, and structural applications. In 2022, the group generated a revenue of US\$ 4.7 billion and joined the Aluminum Stewardship Initiative.

Nemak Slovakia s.r.o. (the 'Entity') is a 100% owned subsidiary of Nemak, S. A. B. de C. V. The Entity produces Aluminum components for the automotive industry, such as engine blocks, transmission cases, e-engine housings, shock towers, battery housings, and more. Most of the production of gravity castings undergoes heat treatment, and further processing is conducted internally. Another important area of production is high-pressure smelting. The plant area covers 171,900 m², of which 56,023 m² are buildings.

The nearest residential areas are Ladomerská Vieska, approximately one kilometre away, and the town of Žiar nad Hronom, approximately three kilometres away. The Entity has approximately 1200 employees.

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	Medium	Medium
RISKS	High	Medium	Medium	Medium
PERFORMANCE	High	Medium	Medium	Medium
OVERALL		MED	IUM	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity is part of the Nemak Group. Both the Entity and the Nemak Group have implemented systems, processes and Procedures to ensure awareness of and Compliance with Applicable Law and other binding obligations. The Entity is certified against the following Management System standards: ISO 14001 (environment), ISO 50001 (energy), ISO 45001 (Occupational Health and Safety) and TISAX (IT security) standards. Compliance risks covering environment, social and governance topics have been identified and are systematically managed.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented a system to fight Corruption in all its forms. A global business Code of Conduct and a global Anti-Corruption Policy have been issued and communicated within the Entity and made publicly available. The Code of Conduct has been translated into several languages and is available on the Nemak website at: https://www.nemak.com/media/2592/code-of-conduct-en-pdf.pdf
		https://nemak.com/media/3041/code-of-conduct-slovakian.pdf
		The Anti-Corruption Policy is available at: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies
		A documented Procedure has been implemented for identifying and monitoring parts of the business that carry a high Bribery risk. Evidence has been provided that Bribery-related risks have been identified and assessed and that personnel are periodically trained on Corruption risks.
1.3a-e Code of Conduct	Conformance	Nemak Corporate has issued and publicly communicated its global Code of Conduct, available in every language where Nemak has operations. For the English version see: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The Code is communicated internally (posters, intranet etc), and
		training is provided annually for new and current employees. Employees are required to sign the Code.
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and communicated its Policy statements through different channels: website, posters, leaflets, notifications about newly published/updated Policies, and provides training for employees. These Policies have been endorsed by senior management who also provides the required resources for implementation and are regularly reviewed.
		Nemak Global Policy documents are publicly available at: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies
		The Entity has established an integrated Management System to ensure effective implementation of the ASI requirements. Several aspects have been certified against international Management System standards (ISO 14001, ISO 45001, and ISO 50001).

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity's Site Manager holds overall responsibility for the implementation of ASI requirements and leads the communication of the Policies at the Entity. This role is supported by a team and their roles are defined. Document review, site tour and interviews confirmed that overall resources are sufficient.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and is maintaining an Environmental and Energy Management System that is certified against ISO 14001 and ISO 50001 standards by an accredited certification body. The recent audit report did not identify any non-conformances.
2.3b Environmental and Social Management Systems - Social	Minor Non- Conformance	The Entity has established a documented and active Social Management System as part of its integrated management approach. It is based on a social risk assessment (along with the Social Accountability Standard SA 8000) where objectives for social management are defined. However, it was identified that a documented action plan to
		implement the objectives was not yet available.
2.4a-e Responsible Sourcing	Conformance	Nemak Group has issued and communicated its Business Code for Suppliers and Sustainable Purchasing Policy, available at: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies
		As part of Nemak's supply chain management, relevant suppliers are systematically assessed and evaluated.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no Major Projects planned since the Entity joined ASI. Some projects were undertaken that did not identify Material social impacts, therefore there was no need for a social impact management plan.
		However, the Entity has established a process for Environmental and Social Impact Assessments for New Projects and Major Changes to existing Facilities taking into consideration baseline conditions. Projects with relevant environmental impacts are listed in the Slovakian public official database 'Enviroportal': https://www.enviroportal.sk
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no major projects planned since the entity joined ASI. The projects undertaken did not identify Material impacts on Humans Rights.
		However, Nemak Corporate has issued a global Procedure to ensure that Human Rights impacts will be assessed in these cases.
2.7a-f Emergency Response Plan	Minor Non- Conformance	The Entity has established site-specific Emergency Response Plans which are regularly assessed and reviewed.
		However, during the Audit, there was no proof on hand to demonstrate that relevant agencies have been involved in the development of the planning of emergencies.
2.8a-d Suspended Operations	Conformance	As confirmed by document review and interviews, the Entity has incorporated business resilience into its planning for abnormal situations. A Crisis Management Manual has been established and is regularly reviewed. The Entity's Crisis Management System has been successfully audited by the corporate owners in 2019.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity is not in a merger or an acquisition (M&A) or post-merger situation. However, there is a Procedure for managing the Due Diligence process for M&As which addresses environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Minor Non- Conformance	Nemak's global business development team is responsible for ensuring that environmental, social and governance practices are reviewed in the planning process for closure, decommissioning and divestment. Management confirmed that there are no plans to close, decommission or divest the Entity's site in Slovakia. However, a documented Procedure has not been provided to demonstrate that all environmental, social and governance practices related to the ASI Performance Standard are considered and that Affected Populations and Organisations are consulted or required to participate in the development of a plan for monitoring Material environmental, social and governance impacts.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social, and economic impacts via the Annual Report which is based on the reporting standards of the Global Reporting Initiative (GRI): https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf Sustainability Model: https://www.nemak.com/sustainability/?sc=0#sustainabilityHome
3.2 Non-compliance and Liabilities	Conformance	The Entity's management has determined the Materiality of non- compliance. Nemak Corporate has disclosed the following statement in the Annual Report 2022 (page 70): 'To the best of the Company's knowledge, there were no instances of non-compliance with laws or regulations in 2022 that had economic impacts relevant to its business, operations, and/or results.': https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf
3.3a-c Payments to Governments	Conformance	The Entity's management has confirmed that it follows the Nemak corporate Anti-Corruption Policy, and no payments to governments were made other than taxes, fees and alike. Accordingly, there was no information about such payments in the Nemak Global Annual Report.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented its Complaints Resolution Mechanism, which is available on its website in multiple languages: <u>https://nemak.com/transparency-helpline</u> The design of the mechanism considered Guiding Principle 31 of the United Nations 'Guiding Principles on Business and Human Rights`.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Products, the assessment is based on the LCA for Experts (ex GaBi) software. The Life Cycle Assessment (LCA) has been documented.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Although customers have not requested LCAs, the Entity has established a Procedure to provide LCA reports upon request.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as they do not have design activities. All product specifications are provided by their customers and the Nemak product design centre (not within the scope of the Entity).
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise and monitor the generation of Aluminium Process Scrap including targets and measures to decrease the generation of production scrap. Scrap quantities are regularly reviewed, and most Aluminium scrap is recycled internally. As confirmed during the site tour, the Entity has developed and applies a strict separation of Process Scrap according to the Aluminium alloy group.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non- Conformance	As a manufacturer of automotive parts, the Entity does not supply directly to consumers but operates in a Business-to-Business (B2B) market. In Slovakia, the EU Directive on End of Life Vehicles (ELV Directive) regulates the recycling of vehicles. The Entity actively contributes to the Circular Economy and not only recycles its internal scrap but also buys Recycled Aluminium.
		However, a documented recycling strategy, including specific timelines, activities and targets was not yet available and as a result, it is not publicly available.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity does not supply directly to consumers but instead operates in a B2B market. The Entity produces auto parts, and the recycling of automobiles is regulated by the European Union Directive 2005/64/EC, with a focus on the type and approval of motor vehicles with regard to their reusability, recyclability and recoverability at End of Life.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Data on Greenhouse Gases (GHG) emissions and energy use is included in the Nemak Global Annual report, page 42: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf
		Emissions data specific to the Entity is publicly available at: https://nemak.com/media/2886/nsvk-energy-and-emissions.pdf
		The data for Scopes 1 and 2 have been independently verified.
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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Conformance	On a global level, Nemak has established and is implementing its Greenhouse Gas Emissions Reduction Plan, which has been approved by the Science Based Targets initiative (SBTi). Nemak publicly disclosed its approach and its GHG Emissions Reduction Pathway in the Annual Report 2022, page 30: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf On the site level, the Entity has established and is implementing its decarbonisation action plan, which is managed within the framework of its certified ISO 50001 Energy Management System. The Entity has developed a site-specific GHG Emissions Reduction Pathway, publicly available at: https://nemak.com/media/3045/slovakia_enm_energy-and-
		emissions-2023.pdf
5.4 GHG Emissions Management	Conformance	The Entity has demonstrated that a system and processes are in place to implement its GHG emissions reduction targets. The GHG Management System is integrated into the Entity's Environmental and Energy Management Systems which are ISO 14001 and ISO 50001 certified.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Minor Non- Conformance	The Entity has quantified and publicly reported on relevant Emissions to Air (particulate matter, sulphur dioxide (SO2), nitrogen oxides (NOx), carbon monoxide (CO), total organic content (TOC), phenol and formaldehyde): https://www.nemak.com/media/2848/nsvk_emissions-water- wastes_2022.pdf
		Actions and efforts to minimise exposure to, and impacts from, Emissions to Air have been demonstrated and described in a documented improvement plan.
		However, the plan to minimise exposure to, and impacts from, Emissions to Air was not publicly available.
6.2a-g Discharges to Water	Conformance	The Entity's discharged water is of the same magnitude as the consumed water, approximately 62.000 cubic metres. Aggregated data is available in the Annual Report (page 48) and Nemak's GRI Index 2022 (page 166).
		Nemak Global Annual report: https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf
		GRI Index: https://www.nemak.com/media/2559/gri-2022.pdf
		Information on the quantities recorded is available in the publicly accessible online Slovak National Environmental Register NRZ (https://nrz.shmu.sk/en/data-access).
		Discharges to Water data specific to the Entity are available at: https://nemak.com/media/2848/nsvk_emissions-water- wastes_2022.pdf
		Based on the Entity's Materiality assessment, it is concluded that it has no Material impact impacts from Discharges to Water and as a result, a water minimisation plan is not required.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Minor Non- Conformance	The Entity has assessed major risk areas of operations including Spills and Leakages within the frame of environmental aspects and impact analysis. The Entity is certified according to ISO 14001. A plan (including compliance controls and a monitoring program) to prevent, detect and remediate Spills and Leakages is in place.
		However, during the site tour, it was observed that empty, uncleaned containers containing hazardous materials were stored outside on the floor without proper catch pans or other means to avoid Leakage or Spills.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	In the event of a Material Spill or Leakage, it would be reported immediately within the Entity. Depending on the severity of the Spill and in compliance with local legislation, additional steps would be taken to inform potentially affected parties, including the relevant authority.
6.5a-c Waste Management and Reporting	Conformance	The Entity has documented and provided training to all employees on its Waste Management Strategy, which is designed in accordance with the Waste Mitigation Hierarchy. The Entity has quantified and publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated from its activities. Aggregated data on Hazardous and Non-Hazardous Waste is available in the Annual Report (page 47) and in the GRI Index 2022 (page 166): https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf
		https://www.nemak.com/media/2559/gri-2022.pdf
		Specific information on Hazardous and Non-Hazardous Waste of the Entity is recorded and available in the publicly accessible online Slovak National Environmental Register NRZ (https://nrz.shmu.sk/en/data-access).
		The Entity has assessed the risk areas of operations including impacts to human well-being and the environment of the Waste within the frame of its environmental aspects and impact analysis. The Entity is certified according to ISO 14001 standard and implemented a Waste minimisation plan.
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	As confirmed through the site tour, interviews and document review, about 100% of the Dross is gathered and recycled externally. The Entity annually reviews the quantity of Dross produced.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has demonstrated that its water withdrawal and use by source and type have been identified and mapped. Water consumption is monitored as a Key Performance Indicator (KPI) within the Environmental Management System. Aggregated data on water intake is available in the Annual Report (page 48) and in the GRI Index 2022 (page 166):

CRITERION	RATING	COMMENT
		https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie ra/ReportesAnuales/IA-2022-en.pdf https://www.nemak.com/media/2559/gri-2022.pdf The Entity regularly assesses the risks related to its water withdrawal in the region, and the risk is rated as low. Entity specific data on emissions, water, and Wastes is available at: https://nemak.com/media/2848/nsvk_emissions-water- wastes_2022.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment identified risks related to water withdrawal and discharge as low. This rating is backed by data from the Aqueduct Water Risk Atlas and monthly water analysis reports.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks to and potential impacts on Biodiversity and Ecosystem Services within its Area of Influence (5 km radius) using the Species Threat Abatement and Restoration Metric (STAR) tool (<u>https://www.ibat-alliance.org</u>). Protected Areas have been also addressed in a local Impact Assessment, and the impact on Biodiversity and Ecosystem Services has been evaluated as low to very low for Nemak Slovakia.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's assessment of Biodiversity and Ecosystem Services in its Area of Influence concluded that the Entity is not dependent on a specific Ecosystem Service and that the risk and impact on Biodiversity are low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Ecosystem Services assessment concluded that the Entity is not dependent on a specific Ecosystem Service and the impact on Biodiversity is low. As a result, an action plan was not developed.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity and Ecosystem Services assessment concluded that the Entity is not dependent on Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has implemented the global Procedure on Biodiversity, which addresses Alien Species. This topic is addressed in the Nemak Business Code for Suppliers (section II). A risk assessment of potential impacts from alien and invasive species was included in the Biodiversity risk assessment. They have implemented preventive measures for shipments coming from other continents.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no world heritage sites in the direct vicinity of the Entity's operation, the nearest world heritage site, Banská Štiavnica is located ten kilometres away. The Entity does not operate or plan to explore or develop New Projects in or close to World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has identified Protected Areas within its Area of Influence (5 km radius). As these Protected Areas are in the vicinity but not directly adjacent to or on the premises of the site, a specific management plan is not required. Instead, the impact on these areas is managed

CRITERION	RATING	COMMENT
		via the Entity's integrated Management System, in particular environment and energy Management Systems.
		In the global Biodiversity and Ecosystem Services Policy, Nemak has committed itself to 'respect legally designated Protected Areas', see section 8.5: https://nemak.com/media/2574/biodiversity-ecosystem-services- policy-public.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 has implemented the Nemak Human Rights Policy: https://www.nemak.com/media/1646/nemak-global-human-rights- policy.pdf
		Human Rights are also addressed in other Policy documents such as the Code of Conduct, Global Diversity & Inclusion Policy, Business Code for Suppliers, and the Sustainable Purchasing Policy, available at: https://nemak.com/sustainability/?sc=0#sustainabilityPolicies
		The Entity has conducted a documented gender-sensitive Human Rights Due Diligence assessment that identified Human Rights issues and strives to prevent or mitigate them concrete action plans. A mapping of Affected Populations and Organisations was available.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity subscribes to the UN Global Compact and joined the initiative's target gender equality program in 2021 to set and deliver on corporate targets for female representation and leadership. In 2022, Nemak also became a signatory to the UN's Women's Empowerment Principles (WEPs) and implemented the Diversity and Inclusion program. A set goal is to further increase the proportion of women at all levels of the organisation by 2030.
		Information about the effectiveness of the measures taken to promote gender equity is publicly available in the Nemak Global Annual Report, pages 60-62: <u>https://investorcloud.s3.amazonaws.com/nemak/InformacionFinancie</u> <u>ra/ReportesAnuales/IA-2022-en.pdf</u>
		Nemak Bloomberg Gender Equality Index (GEI) Survey: https://nemak.com/media/2777/bloomber-gei-v2.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is located in an industrial zone outside the towns of Žiar and Hronom. However, the Entity has identified the presence of cultural heritage sites in the town and in Horné Opatovce. An assessment concluded that the Entity has no direct impact on these cultural sites.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	The Criterion is not applicable to the Entity, as no resettlements have been considered or are taking place since joining ASI, or are expected to occur during the Certification Period.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's Human Rights assessment did not identify any salient issues with regard to the communities in the vicinity of the plant. They conduct social, cultural, and community projects and Nemak's Sustainability Committee oversees all corporate citizenship goals and measures, including implemented Policies and Procedures for supporting community development.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has demonstrated that there are processes to ensure risk- based Due Diligence over its Aluminium supply chain. Management regularly conducts documented risk assessments. The latest assessment confirmed that the Entity is not sourcing from Conflict- Affected or High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented processes and Procedures for its supply chains, which clearly define rules and expectations for suppliers, contractors, and others with whom Nemak does business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a strategy to respond to identified risks in their supply chain. The evaluation of the Entity's suppliers by Nemak's Global Purchasing Department confirmed that the Entity is not sourcing any metal from CAHRAS.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited against the ASI Performance Standard.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has publicly reported on its supply chain Due Diligence process and results in the Annual Report 2022, page 78: https://investors.nemak.com/financiera/informacion_anual

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity's Human Rights risk assessment did not identify Material risks related to security practices. Worker interviews confirmed that there are no known Human Rights violations caused by the security service. Security is operated by a trained and licensed external service provider, which is committed to abiding by the Human Rights Policy and Business Code for Suppliers.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Freedom of Association and employees' right to Collective Bargaining. This is included in the Human Rights Policy, and Code of Conduct, as well as in the Business Code for Suppliers. These documents are regularly reviewed and communicated and are accessible at: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies Male and female union representatives are freely elected by union members and regular meetings take place at least monthly.
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 Freedom of Association and Collective Bargaining is not restricted by law. Slovakia has ratified ILO conventions C87, C98 and C154.
10.2a Child Labour	Conformance	The Entity has committed in its Human Rights Policy and Business Code for Suppliers to strictly prohibit the use of Child Labour: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The Entity follows all regulations and laws related to Child Labour, and forced or compulsory labour and does not employ individuals under the age of sixteen, or 18 years respectively in hazardous working environments.
10.3a-c Forced Labour	Minor Non- Conformance	Based on the Human Rights Policy, the Entity has committed to not use and condemns Forced Labour in any form: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The Entity prohibits the use of all forms of Forced Labour, including indentured labour, bonded labour, slave labour and any form of Human Trafficking. Additionally, the Entity upholds zero tolerance for the use of physical punishment, threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control. However, it was identified the Entity did not issue and publicly disclose an annual Modern Slavery Statement detailing its actions to address modern slavery.
10.4a-c Non-Discrimination	Conformance	The Entity has committed to non-Discrimination and communicates this commitment in its Code Of Conduct, and Diversity and Inclusion Policy: https://www.nemak.com/sustainability/?sc=0#sustainabilityPolicies The Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to

CRITERION	RATING	COMMENT
		Discrimination. This was confirmed by interviews and document review. Employees receive diversity and anti-Discrimination training.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment. This is verified through interviews with Worker representatives.
10.6a-g Violence and Harassment	Minor Non- Conformance	The Entity has made a commitment in the Code of Conduct to ensure that work environments are free from any form of hostility, physical or verbal Harassment, and it does not tolerate any kind of Harassment, including sexual or physical, among others. Through interviews and document review, it has been confirmed that the Entity neither engages in nor tolerates any form of corporal punishment, mental or physical coercion, Harassment, or gender-based Violence, including sexual harassment, or verbal abuse of Workers. However, it was identified the Entity has not yet issued an adequate Policy on Violence and Harassment in the workplace.
10.7a-c Remuneration	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. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid are well above the living wage and are in line with the national industry standard.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and local industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and each employment contract.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and Human Resources management, the Entity's Workers are informed about Human and Labour Rights during the onboarding process and thereafter. All Workers receive documented training on fundamental documents such as the Code of Conduct and Human Rights Policy.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented its Occupational Health and Safety (OH&S) Management System which is ISO 45001 certified by an accredited certification body. The latest available audit report from July 2023 did not reveal any non-conformances. The OH&S Policy is publicly available at: https://www.nemak.com/media/2773/hse-policy.pdf The OH&S Policy is supported by the Entity's local OH&S Policy, available at: https://www.nemak.com/media/2198/politika_hseenm_2021.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's Management System is ISO 45001 certified by an accredited certification body. They have implemented and communicated the OH&S Policy and conduct reviews of the Management System including the Policy annually.

CRITERION	RATING	COMMENT
		Information on the effectiveness of the OH&S Management System is available at (page 4): https://nemak.com/media/2850/bozp_sprava_za_rok_2022.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity's Management System is ISO 45001 certified by an accredited certification body. The Entity has implemented a joint health and safety committee, by which Workers can raise, discuss, and participate in the resolution of OH&S issues with management. Agendas and meeting minutes were readily on hand at the Audit and proof of implemented improvement measures demonstrated the effectiveness of this mechanism.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	15 March 2024	Initial Certification Audit – Full Certification