

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HMT Höfer Metall Technik GmbH & Co. KG

CERTIFICATE NUMBER
369

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
10 MAY 2024

DATE OF EXPIRY
9 MAY 2027

CERTIFIED SINCE
10 MAY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Höfer', with a long horizontal line extending to the right.

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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

Production of semi-finished
Aluminium products at HMT Höfer
Metall Technik GmbH & Co. KG
located in Hettstedt, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HMT Höfer Metall Technik GmbH & Co. KG
ENTITY NAME	HMT Höfer Metall Technik GmbH & Co. KG
CERTIFICATION SCOPE	Production of semi-finished Aluminium products at HMT Höfer Metall Technik GmbH & Co. KG located in Hettstedt, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 13 – 16 November 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 16 March 2024
AUDIT SCOPE	<p>The audit scope covers at HMT Höfer Metall Technik GmbH & Co. KG for the production of semi-finished Aluminium products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">☑ 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	10 May 2024 - 9 May 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 10 May 2025

CERTIFICATE NUMBER 369



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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

Höfer Metall Technik HMT (the 'Entity') is an extrusion plant that specialises in producing Aluminium profiles. It is part of the Höfer group and provides precision profiles to customer specifications, as well as problem-specific and customer-oriented product developments. The Entity's foundry produces up to thirty tonnes of Aluminum billets daily, whilst employees work on two fully automatic extrusion lines. The Entity supplies a growing international clientele in the automobile, construction industry and other sectors. The Entity has established an efficient Management System to meet customer expectations. The processing options range from sawing to stamping, drilling, milling, and joining, and the Entity covers an area of approximately ten hectares with approximately 350 employees on site. The Entity is located within the industrial zone of Hettstedt, Germany.

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	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL				MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes to maintain awareness of and to ensure Compliance with Applicable Law. The Entity has implemented and maintains an Integrated Management System, which is certified against IATF 16949, ISO 14001 and ISO 50001 by an accredited certification body (https://www.hoefer-hmt.de/metanavigation/unternehmen/qualitaet).
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. The Code of Conduct and Supplier Code of Conduct are publicly available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_f%C3%BCr_Gesch%C3%A4ftspartner_-_2023_10_18.pdf</p> <p>The Entity has established multiple anti-Corruption measures including Policies, training, Due Diligence assessments and a whistleblowing function, which are all endorsed by senior management. Relevant employees receive anti-Corruption training.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued and made publicly available its Code of Conduct: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Code includes principles relevant to environmental, social and governance performance. The Entity provides regular training programs for employees.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. This is publicly available within the Code of Conduct: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Entity has provided training to its employees to make them aware of the Policy. The Policy has been endorsed by senior management.</p>
2.2a-c Leadership	Conformance	The Entity has nominated a person at the senior management level with overall responsibility and authority for ensuring Conformance with the ASI Performance Standard and ensuring sufficient resources to support its implementation.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established a certified Integrated Management System according to IATF 16949, ISO 14001 and ISO 50001 standards, which address Environmental Management System requirements. The certificates are up-to-date, and Audit reports confirm the effectiveness of the Environmental Management System.

CRITERION	RATING	COMMENT
		The certifications are available at: https://www.hoefer-hmt.de/metanavigation/unternehmen/qualitaet
2.3b Environmental and Social Management Systems – Social	Conformance	As confirmed by document review and interviews with Workers and management, the Entity has implemented and maintains an effective Social Management System including Human Rights, labour rights and Occupational Health and Safety (OH&S).
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a system and practices for responsible sourcing. The Entity's Supplier Code of Conduct serves as a Responsible Sourcing Policy and addresses environmental, social and governance issues. This Code is publicly available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_f%C3%BCr_Gesch%C3%A4ftspartner-2023_10_18.pdf</p> <p>The Code is regularly reviewed and has been provided to, and acknowledged by the Entity's suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. However, the Entity has developed a documented Procedure relating to Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. However, the Entity has developed a documented Procedure relating to Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has implemented a site-specific Emergency Response Plan (ERPs). The ERP is made available to authorities and auditors, and will be available to external Stakeholders upon request, subject to management's approval.</p> <p>However, it was identified the ERP is partially incomplete and needs to be updated and completed.</p>
2.8a-d Suspended Operations	Conformance	The Entity has systematically identified and evaluated risks associated with its operations. Specific contingency measures associated with suspended operations have been defined for identified risks, as confirmed during the site visits.
2.9a-b Mergers and Acquisitions	Conformance	The Entity in Hettstedt belongs to the Group known as Josef Hoefler GmbH. Mergers and Acquisitions are managed by the Group Headquarters located in Urmitz am Rhein. There are no Merger or Acquisition plans currently nor in the near future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	At the time of the audit, there were no closures, decommissioning or divestments planned. However, the Entity has developed and implemented a Procedure for the management of closure, decommissioning and divestment. Any closure, decommissioning and divestment activities will be centrally managed by the Group Headquarters.

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in its 2022 Sustainability Report which is aligned to Global Reporting Initiative (GRI) Guidelines: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity provides information on non-Compliances and liabilities in the 2022 Sustainability Report, page 14: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf No non-Compliances and liabilities were reported in 2022.
3.3a-c Payments to Governments	Conformance	The Entity only made payments to Government on a legal basis, and there were no payments made to political parties. Any information on related payments is provided in the 2022 Sustainability Report, page 14: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a grievance and whistleblower mechanism (HinSchG-Meldekanal). All grievances can be reported at: https://app.whistle-report.com/report/8428f8fa-94f7-406d-8614-71470f6bf39e
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major product lines and published these data in Environmental Product Declarations (EPDs).
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Environmental Product Declarations (EPDs) are available at the Entity's website (https://www.hoefer-hmt.de), which includes details of the boundaries, underlying assumptions and data sources. The EPD for the billets is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Aluminium-Strangpressbolzen.pdf The EPD for the profiles is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Aluminiumprofil_pressblank.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as it manufactures products according to the customer's design specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a target of 100% Scrap for collection, recycling or reuse. It works continually and systematically to minimise the generation of Scrap. Internal Scrap is collected and remelted. Sawdust and other alloys are separated into different containers and sent to recycling partners.
4.4a-c Collection and Recycling of Products at	Conformance	The Entity only supplies to other businesses and does not sell to consumers. Therefore, the promotion of recycling occurs through the

CRITERION	RATING	COMMENT
End of Life - Material Conversion and other Manufacturing		<p>Entity's support of the local industry association, Aluminium Deutschland e.V.</p> <p>100% of the Entity's internal Pre-Consumer Scrap is recycled directly at their Casthouse. Further Information is included in the Code of Conduct, page 11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity only supplies other businesses and does not sell to directly consumers. As a result, it supports recycling as a member of the Aluminium Deutschland e.V.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has publicly disclosed Material Greenhouse Gases (GHG) emissions and energy use on an annual basis in the 2022 Sustainability Report, pages 6-10: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>Energy and Scopes 1-3 GHG emissions data have been independently verified (see 2022 Sustainability Report 2022, page 7).</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has issued its GHG Emissions Reduction Plan (Klimastrategie), consistent with a 1.5°C warming scenario. The GHG emissions and energy situation was reviewed by the Entity's management and reviews will take place annually.</p> <p>However, it was identified the GHG Emissions Reduction Plan (Klimatratgie) has not been publicly disclosed.</p>
5.4 GHG Emissions Management	Conformance	The Entity works systematically to achieve performance aligned with its GHG Emissions Reduction Plan and targets. It has implemented and maintains an Energy Management System, developed in accordance with ISO 50001.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has determined that its emissions (other than CO ₂ e) are not Material and therefore has not published these data in the 2022 Sustainability Report, page 10: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	<p>The Entity has made its consumption and Discharges to Water publicly available via the 2022 Sustainability Report, pages 10-11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>The Entity does not directly discharge into water and process water is channelled via closed cooling circuits.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed and implemented Policies, systems, Procedures and processes related to the detection, assessment and management of Spills and Leakages. Controls were reviewed to prevent contamination of air, soil and water due to major Spills and Leakages. No major Spills or incidents were reported since the Entity joined ASI – refer to the 2022 Sustainability Report, page 11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>The Entity is subject to national law regarding systems for the management of potentially water polluting substances, and holds an ISO 14001 certificate from an accredited certification body. An assessment and environmental analysis were conducted. The Spill Management Plan is disclosed at the entry gate on site and provided to the local fire department and authorities.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has disclosed information on Spills and incidents in the 2022 Sustainability Report, page 11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>There were no Spills or leakages in the reporting year.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Within its Environmental Management System, the Entity has developed a waste management plan and identified key waste streams generated during production. The type and quantity of the disposed waste is included in the 2022 Sustainability Report, page 11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p>
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water withdrawal, return and consumption data are publicly available in the 2022 Sustainability Report, page 11: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>An assessment of water-related risks in the Watersheds within the Entity's Area of Influence did not identify any Material risks, especially</p>

CRITERION	RATING	COMMENT
		as the consumed quantity is well below one percent of the total extracted quantity of the region.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's water risk assessment did not identify any Material water-related risks.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity risk assessment and considered the site's operations and Area of Influence. The Entity identified their risks and impacts on the Biodiversity and Ecosystem Services as low. Refer to the 2022 Sustainability Report, page 12: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has identified their risks and impacts on the Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has identified their risks and impacts on the Biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the 2022 Biodiversity assessment did not identify Material impacts on Priority Ecosystem Services within the Entity's Area of Influence.
8.4 Alien Species	Conformance	The Entity works to prevent the accidental introduction of Alien Species. According to the supply chain operations of the Entity, the main potential Alien Species risk relate to the usage of wooden pallets. The Entity provides all pallets from local sources (with no or minimum Alien Species risk). All incoming pallets are International Plant Protection Convention (IPPC) labelled and treated, and a risk assessment demonstrated they are in a low-risk category.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not operating in or near a Protected Area or world Heritage site according to the UNESCO World Heritage list. (https://whc.unesco.org/en/statesparties).
8.6a-d Protected Areas	Conformance	The Entity is not located in a Protected Area, as confirmed via online resources. The nearest Protected Areas are approximately five kilometres from the Entity based on the map of Protected Areas of Sachsen-Anhalt. (https://lwa.themenbrowser.de/UMN_LVWA/php/geoclient.php?name=naturschutz). Due to the size and nature of the business, there is no need to implement management plans to ensure the Entity's activities and Facilities do not adversely impact these Protected Areas.
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.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights. The Policy is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/Nachhaltigkeitsreport_-_2022_-_Status_Auswertung_Nov_2023_-_n.pdf</p> <p>The Entity has conducted a documented Human Rights Due Diligence assessment (Bewertung Umwelt, Energie und Sozialaspekte) with internal Stakeholders. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews during the audit.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has demonstrated that it works to promote gender equity and women's empowerment at work. However, it was identified a defined program to promote gender equity and women's empowerment was not yet available at the time of the Audit.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
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 is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites near the Entity as it is located in an industrial area of the town of Hettstedt.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This criterion is not applicable to the Entity, as there have not been any New Projects or Major Changes that required any human displacement.
9.7a-h Affected Populations and Organisations	Conformance	Due to the size and nature of the Entity's Business, there were no significant issues related to the rights and interests of Affected Populations and Organisations within the vicinity of the production sites. As no Significant Risks have been identified, there was no need for an action plan related to populations and communities.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented and executed a risk based-Due Diligence process over its Aluminium supply chain which is in accordance with the OECD Guidance. During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has issued a Supplier Code of Conduct to business partners.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a process to assess and evaluate its suppliers and the associated risk levels. The Entity does not source from conflict affected or high-risk areas. 100% of its Aluminium suppliers are certified to the ASI Performance Standard.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has identified that it does not source from conflict affected or high-risk areas. 100% of its Aluminium suppliers are certified to the ASI Performance Standard. However, the Entity has set up a process to assess, evaluate and monitor their suppliers and the associated risk levels.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices have been audited as part of the ASI Performance Standard Audit. In addition, the Entity is establishing a process to regularly audit the supply chain Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	It was identified that the Entity has not yet implemented annual reporting on supply chain Due Diligence.
9.9 Security practice	Conformance	Document review and worker interviews confirmed that the private security provider respects Human Rights in line with recognised standards and good practices. Furthermore, the private security provider is subject to the requirements of the Entity's Code of Conduct.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Interviews with Workers and their representatives confirmed that the Entity respects the rights of Workers to unite freely, seek representation and join the works councils without interference. The site has a freely elected worker representation and abides by Collective Bargaining agreements with the unions.
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, Applicable Law in Germany does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	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 (an apprentice) was 16 years old at the time of the Audit, as confirmed by interviews and the employee roster.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity does neither engage in nor support the use of Forced Labour and does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and management and document review. In their Code of Conduct, the Entity stated that they

CRITERION	RATING	COMMENT
		do not tolerate any form of Human Trafficking or child Labor and are fundamentally opposed to any type of forced or compulsory labour. However, it was identified an annual public Modern Slavery Statement detailing actions to address Modern Slavery has yet not been issued.
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in the Code of Conduct: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf The Code of Conduct has been made available to Workers and they receive training in the values stated in the Code. As confirmed by interviews and document review, the Entity does not engage in or support Discrimination. The Entity is working towards eliminating the historical disadvantage faced by women.
10.5 Communication and engagement	Conformance	Workers, their representatives and management confirmed that the Entity communicates appropriately and co-operates in good faith on work-related issues. Works Council members and management meet regularly. According to the employees interviewed, the management values its employees.
10.6a-g Violence and Harassment	Conformance	The Entity is committed to a respectful working environment and has prohibited any form of Harassment or pressure in the workplace, nor do they tolerate Discrimination or corporal punishment. Refer to the Entity's Code of Conduct: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf The Code is regularly reviewed, and is communicated to Workers who also receive related training. As confirmed by interviews and document review, the Entity does not engage in, nor tolerate the use of inadequate and unacceptable treatment of Workers.
10.7a-c Remuneration	Conformance	The Entity fulfils the requirements of this Criterion in full, as confirmed by interviews and document review. Wages meet the industry standard and are well above the legal minimum. Supporting evidence, such as work contracts, pay slips and Collective Bargaining agreements were made available during the Audit.
10.8a-c Working Time	Conformance	Interviews and document review confirmed that the Entity complies with relevant law and collective agreements on Working Time, public holidays and annual leave. The provisions in place ensure that Workers have off-time and length of workdays compliant with Applicable Law, industry standards and the requirements of this criterion.
10.9a-b Informing Workers of Rights	Conformance	Interviews with Workers and management confirmed that Workers are informed about their rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has issued and communicated its Policy related to Occupational Health & Safety (OH&S). The Policy is publicly available via the Code of Conduct. The Entity has implemented an active OH&S

CRITERION	RATING	COMMENT
		<p>Management System, as confirmed by site tours, interviews and document review.</p> <p>However, it was identified awareness of compliance with operating instructions could be increased among Workers. In addition, the process for coordinating with external companies or providers is not clearly defined or monitored.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity has implemented a process to review its Management System for OH&S. The Entity conducts internal audits and management reviews are held quarterly. A benchmark with the industry sector is ensured, however, the OHS performance indicators (leading/lagging indicators) are not publicly disclosed and are currently only available on request.
11.2 Employee engagement on Health and Safety	Conformance	Employees are well integrated into occupational safety work throughout the Entity. This is facilitated through participation in risk assessments and participation in occupational safety committee meetings.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 May 2024	Initial Certification Audit – Full Certification