

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TRIMET Aluminium SE (Gelsenkirchen)

CERTIFICATE NUMBER
153

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
TÜV NORD CERT
GMBH

DATE OF ISSUE

28 SEPTEMBER 2024

DATE OF EXPIRY

27 SEPTEMBER 2027

CERTIFIED SINCE

28 SEPTEMBER 2021

AUTHORISED BY

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

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

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

CERTIFICATION SCOPE

Production and trading of foundry alloys, wrought alloys and master alloys from recycled Aluminium Scrap, Dross and primary Aluminium by remelting/refining and casting at the Gelsenkirchen site (Germany).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET Aluminium SE (Gelsenkirchen)
CERTIFICATION SCOPE	Production and trading of foundry alloys, wrought alloys and master alloys from recycled Aluminium Scrap, Dross and primary Aluminium by remelting/refining and casting at the Gelsenkirchen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (27 – 28 July 2021)Re-Certification Audit and Scope Change (23 – 25 July 2024)
AUDIT FIRM	TÜV NORD CERT GmbH
AUDIT DATE	<ul style="list-style-type: none">27 – 28 July 2021 (Initial Certification Audit)23 – 25 July 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">25 August 2021 (Initial Certification Audit)23 August 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (27 – 28 July 2021)</u></p> <p>The Audit Scope includes the production and trading of foundry alloys, wrought alloys and master alloys from recycled Aluminium Scrap, Dross and primary Aluminium by remelting/refining and casting at the Gelsenkirchen site.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (3 – 7 June 2024)</u></p> <p>The Audit Scope includes the production and trading of foundry alloys, wrought alloys and master alloys from recycled Aluminium Scrap, Dross and primary Aluminium by remelting/refining and casting at the Gelsenkirchen site.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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

28 September 2024 – 27 September 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

27 September 2027

CERTIFICATE NUMBER

153



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

TRIMET operates a remelting plant for the recycling of Aluminium at its site in Gelsenkirchen (the 'Entity') with a capacity of approximately 70,000 tonnes. The input materials include Scrap from industrial processing and the recycling industry, as well as residues obtained from Aluminium production. The products include Aluminium alloys both in solid and liquid form, primarily for use by the automotive and automotive supply industry. The premises of the recycling plant are located in Gelsenkirchen-Schalke at the commercial port, which is connected to the Rhine-Herne Canal (approximately 700 metres north and covers an area of approximately two and a half hectares. The Gelsenkirchen site currently employs approximately 100 people.

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	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL				HIGH

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes that allow for the adequate awareness of legal requirements and ensure compliance with Applicable Laws and regulations. At a corporate level, legal developments are systematically monitored, and competent legal advice is available. The Entity's management confirmed that there were no legal disputes or violations in the previous certification period.
1.2 Anti-Corruption	Conformance	Policies and processes have been developed and implemented to identify and prevent Corruption. Designated guidelines and processes for identifying and preventing Corruption are also provided to employees as part of the training framework. Annual risk analyses have been undertaken and registers are in place. No violations have been identified.
1.3a-e Code of Conduct	Conformance	A Code of Conduct, a Human Rights Code and a Supplier Code which address environmental, social and governance principles are available for all stakeholders on the TRIMET website, available at: https://www.trimet.eu/en/trimet/compliance
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	TRIMET's integrated management policy is consistent with the environmental, social, and governance requirements of the ASI Performance Standard. This policy is adequately communicated on the TRIMET website at: https://www.trimet.eu/en/trimet/sustainability/corporate-management This Policy has been endorsed by senior management and is periodically reviewed. Responsibilities are also defined and adequate resources are provided.
2.2a-c Leadership	Conformance	A Board Member of TRIMET Aluminium SE has the overall responsibility and authority to ensure conformance with the ASI Performance Standard at the Entity, with adequate resources provided.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid DIN EN ISO 14001:2015 certificate, available at: https://www.trimet.eu/en/downloads/certificates
2.3b Environmental and Social Management Systems - Social	Conformance	A Social Management System is incorporated into the implemented Occupational Health and Safety Management System, TRIMET's compliance system and TRIMET's Human Rights code. The Entity has an implemented and documented Occupational Health and Safety System and holds a valid DIN ISO 45001:2018 certificate.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and communicated its Responsible Sourcing Policy and its Supplier Code of Conduct, which addresses environmental, social and governance issues. The Policy is available at: https://www.trimet.eu/en/trimet/compliance/supplier-code-of-conduct https://www.trimet.eu/fileadmin/downloads/de/zertifikate/Guideline_f

CRITERION	RATING	COMMENT
		or_responsible_procurement.pdf The Entity has also established documented processes for risk assessments and evaluation to implement these Policies.
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has developed and implemented systems and processes to conduct Impact Assessments for New Projects or Major Changes. Such impact assessments are required under German law. The outcome of the environmental impact assessment is part of the respective approval of the district government. The approval of the latest Major Changes is published at: https://www.bezreg-muenster.de/zentralablage/dokumente/umwelt_und_natur/immissionsschutzrechtliche_genehmigungsverfahren/2024/Trimet-Aluminium-SE_-Gelsenkirchen-500-53_0029_23_3_4_1.pdf The outcome of the respective environmental impact assessment is published at: https://www.uvp-verbund.de/portal/
2.6a-h Human Rights Impact Assessment	Conformance	Human Rights Impact Assessments are organised and completed at a Board level. The respective Board members are informed by the internal Legal & Compliance Department on any identified potential Human Rights risks. The Board was recently informed that the new project, which is currently being implemented on site, does not entail any particular changes in terms of Human Rights risks, as the size and basic organisation of the site remain unchanged.
2.7a-f Emergency Response Plan	Conformance	As part of the Entity's ISO 14001 Environmental Management System, an Emergency Response Plan has been implemented. The Entity has implemented and trained the Emergency Response Plan. External Stakeholders including the Local Community and relevant authority are involved in the plan. Regular training sessions are held with employees. Relevant Stakeholders (e.g. Local Authorities) can access the Emergency Response Plan upon request.
2.8a-d Suspended Operations	Conformance	Suspension of operations requirements of the ASI standard are fulfilled for the Entity at the Board level of TRIMET with the support from internal and external lawyers and other external experts.
2.9a-b Mergers and Acquisitions	Conformance	Merger and acquisition requirements of the ASI Performance Standard are fulfilled for the Entity at the Board level of TRIMET Aluminium SE.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning requirements are established in German Law. Closure and decommissioning requirements of the ASI Performance Standard are fulfilled at the Board level of TRIMET Aluminium SE.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	TRIMET Aluminium SE has prepared its Sustainability Report in accordance with the GRI Sustainability Reporting Guidelines, available at: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has issued a publicly available 'Non-compliance and Liabilities' Statement, in which senior management confirmed that

CRITERION	RATING	COMMENT
		there were no Material fines, penalties or sanctions issued in the previous three years.
3.3a-c Payments to Governments	Conformance	Payments to governments did not take place at the Entity, except for taxes and fees levied on the basis of laws and regulations.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	All of the Entity's stakeholders have opportunity to submit complaints, grievances and requests for information in person or online at any time. External communication is managed by TRIMET's Public communication department. In addition, the Entity has established a web-based 'whistleblower' system - TRIMET Integra - which enables stakeholders to report complaints.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has completed a Life Cycle Assessment (LCA), which was prepared in general accordance with both ISO 14040 and ISO 14044 methodologies.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA can be provided to interested stakeholders by the Entity's management if required. There have been no requests received to date.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise the generation of Scrap. When Scrap is generated, the Entity collects 100% of Scrap material for recycling and thoroughly separates alloys, as the Entity's core activity is the recycling of external Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	TRIMET supports various activities of associations, including European Aluminium and Aluminium Deutschland in order to promote recycling of end-of-life products.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Direct CO ₂ emission data are made available as part of the sustainability reporting process. The data are independently verified. Energy consumption is also reported as part of TRIMET's sustainability reporting process. Scope 3 emissions are determined and verified as part of the Product Carbon Footprint (PCF) calculation and are made available to the customer on request. https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf (page 28)
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Started production after 2020		
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	Conformance	<p>The Entity's emission targets are documented and tracked in the energy and environmental programme and in the Entity's Key Performance Indicator (KPI) profile. An emissions reduction plan is publicly available, and the Entity has recently completed its pathway development exercise, using the ASI Pathway Calculation Tool to determine the GHG reduction plan. The Entity has used 2028 as an interim target, and according to the ASI approach, GHG emissions are to be reduced by 8 percent (CO₂/t Al) by the end of 2028.</p> <p>The ASI Pathway Calculation Tool has been used to determine the GHG reduction pathway, and the Entity has selected 2023 as the baseline year. It has derived their decarbonisation pathway and reliable and verifiable measures to reach 'five year step goals' based on the results of the tool. The Entity's pathway curves of the tool (i.e. casthouse Scope 1+2 and procurement scope 3 (category 1)) are well below the sectoral pathway slopes.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy and Environmental Management System according to DIN EN ISO 50001:2018 and DIN EN ISO 14001:2015 and a process and controls to achieve performance aligned to the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Relevant emissions are continuously measured and monitored and emissions are within the legally prescribed limits. Programs to reduce emissions are in place as part of the Entity's environmental management system. Relevant emissions are reported annually in the Sustainability Report - refer GRI 305 https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf (page 29).</p> <p>The Entity measures its Emissions to Air and reports to the local environment authority on a daily basis. If externally mandated limits are exceeded, the relevant Local Authority will be informed and corrective actions will be implemented.</p>
6.2a-g Discharges to Water	Conformance	<p>Relevant emissions are continuously measured and monitored and emissions are within the legally prescribed limits. Only rainwater and sanitary water is generated, but no process water. There is no discharge into bodies of water. The relevant water data are disclosed in the TRIMET Sustainability Report on page 27: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	An assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and soil is undertaken by following the risk assessment process of environmental management system. Assessment and Management of Spills and Leakage is

CRITERION	RATING	COMMENT
		defined in the Entity's environmental management system. The Entity confirmed that during the reporting period, there were no Spills, Leakages or similar incidents.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Any reportable Material releases and remedial actions implemented are reported in the TRIMET Sustainability Report. There were no significant releases in the reporting period. https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf (page 24).
6.5a-c Waste Management and Reporting	Conformance	Waste management requirements are obligated by German law and are incorporated into the Entity's environmental management system. Relevant waste data are shown in the TRIMET Sustainability Report - GRI 306-3 https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf (page 29). The Entity has managed its waste in accordance with the Waste Mitigation Hierarchy.
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	Dross as external input material as well as Dross from internal processes are remelted/recovered to 100 percent on site. These materials are stored in a covered area and in separate boxes.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	Water withdrawals sewage disposal are measured and monitored and referred to in the TRIMET Sustainability Report - GRI 303 https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2022-de.pdf (page 27). There are no process waters generated and disposed off-site.
7.2a-e Water Management	Not Applicable	This Criterion does not apply to the Entity as risks identified in the Water Assessment are assessed and documented as low (i.e. no process water).
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Impact Assessments are part of the legally required process to gain permission to operate and are also incorporated into the Entity's environmental management system. The Entity has developed and implemented systems and processes to conduct Impact Assessments for Biodiversity and Ecosystem Services. The outcome of the Biodiversity and Ecosystem Services is also a part of the respective approval of the District Government.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion does not apply to the Entity as risks identified in the impact assessment are assessed and documented as low. With regard to the 2024 permit, the result of the preliminary assessment in accordance with the UVPG is classified as low, as no significant

CRITERION	RATING	COMMENT
		adverse effects on ecologically sensitive areas are to be expected. Any risk to water and soil has also been assessed as low to negligible.
8.2a-g Biodiversity Management	Not Applicable	This Criterion does not apply to the Entity as risks identified in the impact assessment are assessed and documented as low. With regard to the 2024 permit, the result of the preliminary assessment in accordance with the UVPG is classified as low, as no significant adverse effects on ecologically sensitive areas are to be expected. Any risk to water and soil has also been assessed as low to negligible.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the recent Biodiversity and Ecosystem Services Assessment did not identify any priority Ecosystem Services.
8.4 Alien Species	Conformance	Although the risk is low, Alien Species may be spread via the storage, handling and transportation of Dross, Scrap metal and vehicles. All Dross and metal received are remelted in a furnace which ensures that all organic material is thereby destroyed.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that it is not operating in or near a Protected Area or World Heritage Property.
8.6a-d Protected Areas	Conformance	The Entity is located in an industrial zone, which has been in operation for approximately 90 years. There are no Protected Areas within the direct vicinity of the Entity. The nearest Protected Area is approximately one kilometre away. TRIMET's 2022 Sustainability Report (page 19) confirmed that it is not operating in or near a Protected Area.
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 commitment to the preservation of Human Rights can be found in TRIMET's Human Rights Code, available at: https://www.trimet.eu/en/trimet/compliance/code-of-human-rights The Entity has conducted a documented Human Rights Due Diligence assessment. Human Rights impacts are assessed by a risk based approach. To date no major Impact on Human Rights was identified.
9.2a-e Gender Equity and Women's Empowerment	Conformance	TRIMET communicates in its Code of Conduct, Human Rights Code and Supplier Code the commitment to non-Discrimination of women and promotes Women's Empowerment Principles. Refer to: https://www.trimet.eu/en/trimet/sustainability/gender-equality A policy to foster gender equity and women's empowerment has been established and the Entity is currently working on its implementation. The Works Council ensures that women are not disadvantaged in recruitment. The Sustainability Report (refer to GRI 405) discloses relevant data.

CRITERION	RATING	COMMENT
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. The Entity is located in western Germany.
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. The Entity is located in western Germany.
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. The Entity is located in western Germany.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. There are no cultural and sacred heritage sites in the vicinity of the Entity as it located in an industrial area. The Entity has assessed the presence of cultural and sacred heritage in their vicinity but did not identify any.
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 directly affected by the Entity's operations. There are no cultural and sacred heritage sites in the vicinity of the Entity as it located in an industrial area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as there have been no previous incidences of, nor future plans for resettlements or displacements.
9.7a-h Affected Populations and Organisations	Conformance	The outcome of the Human Rights Due Diligence conducted has not identified the presence of related issues affecting local Communities. The Entity is located within an industrial area.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Procurement and responsible sourcing are managed at the corporate level of TRIMET in Essen, Germany, and TRIMET is committed to providing supply chain transparency in accordance with Applicable Laws and regulations, including the <i>German Supply Chain Act</i> . The Entity is incorporated into the TRIMET management system at corporate level in Essen/Germany to avoid any involvement in armed conflict or Human Rights abuses including a policy, the definition of responsibilities and attribution of resources, a documented due diligence procedure duly, the collection of information regarding suppliers, and a grievance mechanism.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity (via TRIMET Corporate) has implemented a due diligence procedure that includes the identification and assessment of Conflict-Affected and High-Risk Areas risks in its supply chain. Risks have been assessed for all relevant suppliers, considering different resources.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity (via TRIMET Corporate) has implemented a policy that includes the way to respond to identified Conflict-Affected and High-Risk Areas risks in its Aluminium supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity (via TRIMET Corporate) has prepared itself to be audited by a third party on its due diligence practices. This present review provides evidence of this. This ASI Performance Standard Audit also serves to address this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity (via TRIMET Corporate) reports annually on its supply chain Due Diligence regarding CAHRAs in its Modern Slavery statement, available at: https://www.trimet.eu/en/downloads/sustainability
9.9 Security practice	Conformance	The Entity's external service provider or on-site security ensures respect for Human Rights and trains its employees accordingly.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Based on the collective bargaining agreement for the metal industry in Germany (IG Metall), the Entity has developed additional agreements between itself and the Works Council which are valid for all Workers. The Entity has a well-established Works Council, in accordance with German law.
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 it operates in Germany where Applicable Law permits the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in Germany. Young Workers (from the age of 15 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. Employees and plant managers are aware of these legal regulations.
10.3a-c Forced Labour	Conformance	The Entity commits itself to respect Human Rights - and expects its suppliers to do the same. The Entity only works with trustworthy employment agencies, and is not involved in Forced Labour, neither direct nor through recognised labour agencies. Neither deposits nor security payments are required. TRIMET's Modern Slavery Statement is available at: https://www.trimet.eu/fileadmin/downloads/de/Berichte/Modern_Slavery_Statement_-_2024.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in the TRIMET Human Rights Code and the respective Policy. The Entity expects the same from its suppliers via a commitment to its Supplier Code. The German <i>General Equal Treatment Act</i> (AGG) prohibits discrimination in connection with six different characteristics.
10.5 Communication and engagement	Conformance	Direct and frequent communication with Workers and the Worker representatives is established. A web-based whistleblower system -

CRITERION	RATING	COMMENT
		TRIMET Integra has been implemented. https://www.trimet.eu/en/trimet/compliance/trimet-integra
10.6a-g Violence and Harassment	Conformance	The Entity prohibits Violence and Harassment at all times and has implemented a Policy against Violence and Harassment. The Entity has stipulated in its Human Rights Code that it does not tolerate harassment, violence or Discrimination against its employees. https://www.trimet.eu/fileadmin/downloads/de/Kodex/TRIMET-Human_Rights_Code-EN-2023.pdf
10.7a-c Remuneration	Conformance	All wages are regulated through the collective bargaining agreement of the metal sector which are considerably higher than the statutory minimum wage in Germany. All payments are made on time and are documented and submitted at the end of the month to the employees' bank accounts.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is specified in each employment contract. A 'clocking-in' system is in place and records are accessible.
10.9a-b Informing Workers of Rights	Conformance	The Entity regularly informs Workers of their Rights through onboarding, communication channels and the Human Resources team. Workers' representatives and Union representatives are also an important relay of information for Workers on their Rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is certified to ISO 45001 – refer to: https://www.trimet.eu/en/downloads/certificates . It has an Occupational Health and Safety Policy that has been communicated to employees and is reviewed and revised as required. Annually, the ISO Auditor reviews the requirements of the standard, which include, among other things, the provision of resources by the management board. OH&S performance data are available and publicly disclosed in the Sustainability Update at: https://www.trimet.eu/en/trimet/locations/site-gelsenkirchen
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The effectiveness of the OH&S Management System is annually reviewed by senior management. OH&S performance indicators are made publicly available in TRIMET Aluminium SE's annual Sustainability Report 2022, pages 31 - 34. OH&S statistics are compared annually with international companies in this sector via European Aluminium. These statistics are made available to all facilities. In an international comparison, the figures are currently still above average. As part of the cross-site 'Vision Zero' campaign, many processes and structures have been standardised and optimised across the Entity which has led to the creation of a cross-site accident reporting system in which each site within TRIMET is compared with each other on a daily basis.

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	Formal cooperation between the Entity's management and its Workers is in place. The Entity meets the legal requirements and has formed an Occupational Safety Committee that meets on a quarterly basis. The Entity's management discusses the topics relevant to Health and Safety with the Works Council, the Entity's physician, Safety Officers and other persons and defines goals and measures that are pursued in this Committee.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	28 September 2021	Initial Certification Audit - Full Certification
1	28 September 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.