

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hammerer Aluminium Industries Santana SRL

CERTIFICATE NUMBER

101

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

TÜV RHEINLAND
CERT GMBH

DATE OF ISSUE

11 NOVEMBER 2024

DATE OF EXPIRY

10 NOVEMBER 2027

CERTIFIED SINCE

11 NOVEMBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by 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 extrusion billets and
rolling ingots from Recycled
Aluminium scrap at the Santana
SRL facility, Romania.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Santana SRL
CERTIFICATION SCOPE	Production of extrusion billets and rolling ingots from Recycled Aluminium Scrap at the Santana SRL facility, Romania.
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 (17 – 18 August 2020)Surveillance Audit (13 – 15 September 2021)Surveillance Audit (25 May 2023)Re-Certification and Scope Change Audit (September 24 – 27 October 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">17 – 18 August 2020 (Initial Certification Audit)13 – 15 September 2021 (Surveillance Audit)25 May 2023 (Surveillance Audit)September 24 – 27 October 2024 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">15 October 2020 (Initial Certification Audit)6 November 2021 (Surveillance Audit)26 May 2023 (Surveillance Audit)14 October 2024 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (17 – 18 August 2020)</u></p> <p>The Audit Scope includes the production of extrusion billets and rolling ingots from Recycled Aluminium Scrap at the Santana SRL facility, Romania. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (August 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p> <p><u>Surveillance Audit (13 – 15 September 2021)</u></p>

The Audit Scope includes the production of extrusion billets and rolling ingots from Recycled Aluminium Scrap at the Santana SRL facility, Romania. Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

Surveillance Audit (25 May 2023)

The Audit Scope includes the production of extrusion billets and rolling ingots from Recycled Aluminium Scrap at the Santana SRL facility, Romania.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

The Criterion in the ASI Performance Standard identified as a non-conformity in the previous surveillance audit was included in the Audit Scope.

Re-Certification and Scope Change Audit (September 24 – 27 October 2024)

The Audit Scope includes the production of extrusion billets and rolling ingots from Recycled Aluminium Scrap at the Santana SRL facility, Romania.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

The Criterion in the ASI Performance Standard identified as a non-conformity in the previous surveillance audit was 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

11 November 2024 – 10 November 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

11 November 2026

CERTIFICATE NUMBER

101



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

The HAI Santana SRL and HAI Recycling SRL facilities (the 'Entity') commenced operations in 2010 as a site of Hammerer Aluminium Industries Group, a recognised leader in the Aluminium industry. The main activity at the Entity is the production of extrusion billets and rolling ingots from Recycled Aluminium Scrap. The main customers of the manufactured products are Aluminium extrusion, forging and rolling plants which are in Europe.

The Entity has a modern infrastructure that allows the processing of close to 600 tonnes of Aluminium per day, contributing to an efficient recycling cycle. The maximum projected capacity of the installation per year is approximately 200,000 tonnes of secondary Aluminium from which approximately 150,000 tonnes are saleable.

The components of the installation are thus dimensioned to obtain from Aluminium waste (slags, crusts, and Aluminium Scrap), and Recycled Aluminium. The advanced technologies used guarantee a high-quality finished product, according to the requirements of the international markets.

The Entity is in the western part of Romania in Arad County, the nearest townships to the Facility are Santana, two kilometres away and Zimandu Nou, approximately six kilometres from the Entity. The site is not located in any Protected Areas and the area under management is approximately 23.4 hectares (ha) and has approximately 150 employees engaged on a full-time basis.

The main processes and activities include handling and storage of supplied goods, melting and Casting specific equipment, homogenisation lines for billets and slabs, packaging and finished goods storage and logistics. The Facility also includes on-site administrative offices, a medical office, heavy and mobile equipment, storage areas, laboratory and fuel and chemical storage.

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	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to legal compliance requirements. There are systems in place (e.g. legal databases) to maintain awareness of and to ensure Compliance with Applicable Law. The Entity holds ISO 14001, ISO 45001, ISO 50001 and IATF 16949 certifications from TÜV Rheinland Cert, an accredited certification body. Copies of the certificates can be found at the Hammerer website: https://www.hai-aluminium.com/downloads HAI Group supports the site with legal counsel.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. Amongst the instruments is an anti-Corruption Policy as well as a Code of Conduct (https://www.hai-aluminium.com/downloads) issued and communicated internally and externally.</p> <p>Risks relating Corruption have been assessed. The Entity has provided training to employees with regard to business ethics. HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially. An external tax auditor periodically audits the financial system.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has published and communicated a Code of Conduct for their employees both in English and the local language at: https://www.hai-aluminium.com/downloads</p> <p>The latest version at the time of the Audit was dated June 2024. It is clearly stated that the Entity does not way tolerates Corruption, ant-trust violations, bribes, money laundering, unfair advantages, Corruption or prohibited agreements. The Entity has established Management Systems to ensure the implementation of HAI's Code of Conduct.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with environmental, social and governance practices. Employees are subject to periodic training on the Policies. The Entity holds certificates according to ISO 14001, ISO 45001, ISO 50001 and IATF 16949 from TÜV Rheinland Cert, an accredited certification body, which is current for the Entity's certification scope.</p> <p>In accordance with the Entity's Environmental, Health & Safety Management System, the Entity receives senior management endorsement and support through the provision of resources and annual review of the Policies.</p> <p>The HAI Group has communicated the Policies internally and externally as appropriate and its Supplier Code of Conduct is actively communicated to relevant suppliers. Workers received training regarding environmental, social, and governance Policies.</p>
2.2a-c Leadership	Conformance	<p>The Entity's Chief Operating Officer (Technical Managing Director) has the overall responsibility and authority to ensure conformance with the ASI Performance Standard and ensure sufficient resources to support its implementation. The role is supported by the local team as</p>

CRITERION	RATING	COMMENT
		well as by the staff from HAI Group. Responsibilities are reflected in the organisational charts and job descriptions.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System according to ISO 14001 and an Energy Management System according to ISO 50001. These systems are certified by an accredited certification body, refer to: https://www.hai-aluminium.com/downloads During the recent external Audit of these Management Systems, full compliance with said standards was confirmed and no non-conformity was raised.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented an accredited OH&S Management System (ISO 45001). There are no non-conformities open from the latest Audit. Human and Labour Rights are also managed, but no accredited certification is available.
2.4a-e Responsible Sourcing	Conformance	HAI has issued its sourcing policy called the 'Code of Conduct for Suppliers', accessible at: https://www.hai-aluminium.com/downloads Suppliers have either to acknowledge this Code or provide an equivalent Code of their own. The Group's sourcing process is documented, and it is in accordance with the requirements of the ASI Performance Standard. Regular Due Diligence and supplier evaluations take place, which are conducted by HAI's central metal management department in Ranshofen, Austria, which is responsible for all metal purchases for the Entity.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as larger projects or Major Changes to existing Facilities have not taken place since the Entity joined ASI. No Major Changes/projects are planned for the time being. A procedure is available to ensure that social, cultural and Human Rights Impact Assessments, including a gender analysis, will be conducted for New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as larger projects or Major Changes to existing Facilities have not taken place since the Entity joined ASI. No Major Changes/projects are planned for the time being. A procedure is available to ensure that social, cultural and Human Rights Impact Assessments, including a gender analysis, will be conducted for New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with relevant Stakeholders such as the relevant authority and industrial neighbours. The Entity also holds ISO 14001 and ISO 45001 certifications which are current to the Entity's certification scope under the ASI Performance Standard. The Emergency Response Plans are made available to Stakeholders as required.
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. Business continuity planning is in place and subject to regular review.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity has not undergone or planned a merger or acquisition (M&A) since becoming an ASI member. However, a process has been defined to manage M&A activities should they become relevant. M&As would be managed by HAI group's headquarters in Ranshofen, Austria.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has not undergone or planned any closure, decommissioning or divestment since becoming an ASI member. However, a process has been defined to manage closure, decommissioning or divestment, should it become relevant. It is defined that environmental, social and governance issues will be reviewed in such a case.
3. Transparency		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its Material environmental, social and economic impacts by issuing the HAI Group Sustainability Report 2023, based on Global Reporting Initiative's (GRI) G4 guidelines. This report is issued by the HAI group, available at: https://www.hai-aluminium.com/downloads (German) https://www.hai-aluminium.com/en/download-center (English)
3.2 Non-compliance and Liabilities	Conformance	Information on significant fines, judgments, penalties and non-monetary sanctions is included in the Sustainability Report 2023, page 68: https://www.hai-aluminium.com/downloads As confirmed with the Entity's management, there were no significant fines, judgments, penalties or non-monetary sanctions enforced since the previous Audit.
3.3a-c Payments to Governments	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to anti-Corruption requirements related to payments to governments and the facilitation of payments. The Codes of Conduct for Employees and Suppliers can be accessed at: https://www.hai-aluminium.com/downloads As confirmed with the Entity's management and according to the report of the financial audits 2023, the Entity did not make Government payments other than taxes, fees and social insurance. All payments are subject to an annual external financial audit. In a publicly available addendum to the Sustainability Report 2023: https://www.hai-aluminium.com/wp-content/uploads/2024/09/Addendum_NHB_2023.pdf It is stated that HAI Group has not made any payments or financial contributions to any government entities or political parties in 2023.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	In HAI's Code of Conduct, Stakeholders are made aware of the contact details of the legal counsel. A Complaints Resolution Mechanism has been established (email and anonymous 'letter box'), including a register of complaints/grievances. No complaints/grievances have been received so far via this mechanism. In the Sustainability Report 2023 (page 68), Stakeholders are encouraged to raise their concerns and a dedicated email address: sustainability@hai-aluminium.com

CRITERION	RATING	COMMENT
		The report is accessible at: https://www.hai-aluminium.com/downloads
4. Material Stewardship		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major products with support from an external specialised consulting firm. One major outcome is that the CO2 footprint (Scopes 1-3) is below 2 kg CO ₂ / kg Aluminium billet.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has issued a Life Cycle Assessment (LCA) (prepared by a specialised external consulting firm) and is available on request to its customers. Summary information regarding carbon footprint is given in Sustainability Report 2023, page 27: https://www.hai-aluminium.com/downloads There are also Environmental Product Declarations (EPDs) available (refer to: https://ibu-epd.com/veroeffentlichte-epds), search for "Hammerer"). These EPDs contain underlying assumptions, including system boundaries.
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 systems and a robust program in place to recycle 100% of its Aluminium Process Scrap on-site. The minimisation of Internally Generated Scrap is a management priority, and it is monitored monthly. The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium.
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	As a recycling company, the Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products.
5. Greenhouse Gas Emissions		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has disclosed its Material Greenhouse Gas (GHG) emissions (Scope 1, 2 & 3 (Category 1)) and energy use by source in Sustainability Report 2023 (pages 31 and 34), and in a separate addendum to the Sustainability Report. Both documents can be accessed at: https://www.hai-aluminium.com/downloads An external company verifies the Entity's GHG emissions and submits a report to the Romanian National Environmental Agency annually. In the publicly available addendum to the Sustainability Report 2023, a statement on GHG emissions data verification is provided (page 15): https://www.hai-aluminium.com/wp-content/uploads/2024/09/Addendum_NHB_2023.pdf

CRITERION	RATING	COMMENT
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	Conformance	<p>In accordance with its certified Energy Management System according to ISO 50001, the Entity via the HAI group has published its GHG emissions reduction targets and has implemented a plan to achieve these targets in the addendum Sustainability Report 2023 https://www.hai-aluminium.com/wp-content/uploads/2024/09/Addendum_NHB_2023.pdf</p> <p>The GHG Emissions Reduction Pathway was designed using the ASI GHG methodology and it is consistent with a 1.5°C Warming Scenario. The GHG Emissions Reduction Plan includes an Intermediate Target covering a period no greater than five years.</p> <p>Additionally, the HAI Group has committed to the Science Based Target Initiative (SBTi). HAI committed to SBTi, and verification of the Entity's targets is planned for 2025.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	The Entity participates in the EU Emission Trading Scheme and currently holds ISO 50001 Certification. The most significant contribution to its overall carbon footprint originates from Primary Aluminium. It was noted however that the Group's GHG Emissions Reduction Management System is not yet adequately documented at the Headquarters level.
6. Emissions, Effluents and Waste		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity measures regularly (monthly and annually) its Material Emissions to Air. Emission data are reported to the relevant authority and input into the European Pollution Register (E-PRTR). The sampled data during the audit confirmed that the Entity's Emissions to Air meet the best available technique, as the data were in accordance with the EU "Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries" (EU BAT reference document). Refer to: https://eippcb.jrc.ec.europa.eu/sites/default/files/2020-01/JRC107041_NFM_bref2017.pdf</p> <p>Emissions data are publicly available in the European Pollution Register at: http://prtr.anpm.ro</p> <p>However, the information stating that there is no current need for an emission reduction plan because the Entity is already using the best available technique has not yet been publicly disclosed.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity reports quantitative data on its Discharges to Water in its Sustainability Report 2023, page 35: https://www.hai-aluminium.com/downloads</p> <p>Wastewater from production and sanitation is treated on site (mechanical-biological process). Following treatment, the water is discharged to a local natural canal (as well as stormwater, which is which is first diverted via an oil separator).</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a certified Environmental Management System according to ISO 14001, including emergency, monitoring and communication procedures, to manage major risks of Spills and Leakage. The Entity periodically assesses the risks areas related to Spills and Leakages. The Entity's management confirmed there have been no Material environmental incidents since the previous Audit.
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	Information to the public on Spills and Leakages is provided via the Sustainability Report 2023, page 32: https://www.hai-aluminium.com/downloads In the Report it is stated that in 2023 there were no leaks or leakages, nor was there a significant release of substances. However, contamination due to leakages or damage of the stationary or a vehicle's diesel tank is identified as a Material risk to the Watershed. This risk has been managed but has not yet been disclosed to the public.
6.5a-c Waste Management and Reporting	Conformance	In accordance with its certified Environmental Management System according to ISO 14001, the Entity implemented a waste management strategy according to the Waste Mitigation Hierarchy. This has been confirmed by interviews and a review of the Entity's annual Environmental Report 2024. The Entity has publicly disclosed the quantity of their generated waste in the Sustainability Report 2023, page 37: https://www.hai-aluminium.com/downloads
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	100 percent of the collected Dross is recycled on-site. Dross is not landfilled. The Entity works continuously to maximise the recovery of Aluminium by treatment of Dross and Dross residues. Key factors are trained Workers, technical parameters of the furnace and the remelting process. All Dross residues (Salt Slag) are sent for recycling to either domestic or international treatment plants.
7. Water Stewardship		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. Documented water mapping identifies the source, use and destination of the water streams and quantifies them. In Sustainability Report 2023 (page 35), the consumed quantity of freshwater is made publicly available. The Entity has assessed water-related risks in Watersheds in the Area of Influence. As confirmed by publicly available sources such as the aqueduct tool (https://www.wri.org/applications/aqueduct/water-risk-atlas), and the WWF Risk Filter (https://riskfilter.org/water/explore/map/europe). The Entity is not located in an area of high water stress.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water assessment did not identify Material risks related to water withdrawal. A written

CRITERION	RATING	COMMENT
		statement from the local authority has confirmed the Entity's evaluation.
8. Biodiversity and Ecosystem Services		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Based on the biodiversity assessment (conducted by a specialised consultant), the Entity has implemented a biodiversity and Ecosystem Services action plan. Its implementation is monitored periodically, and progress has been demonstrated.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as based on the assessment performed by an external specialised service provider, the Entity's impact on the biodiversity was rated as low. There was no observation made during the Audit that the Entity's impact on Ecosystem Services in its Area of Influence would be Material.
8.2a-g Biodiversity Management	Conformance	<p>Whilst the Entity's biodiversity assessment did not identify significant or Material impacts, the Entity has established and is implementing its Biodiversity Action Plan, which is endorsed by the site management team and contains time-bound goals. This was confirmed through document review and interviews.</p> <p>The biodiversity and Ecosystem Services action plan (which reflects the Biodiversity Mitigation Hierarchy) has been established in consultation with community representatives, although there has been limited interest from other Stakeholders to date.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as no Priority Ecosystem Services were identified in the Entity's recent biodiversity and ecosystem assessment.
8.4 Alien Species	Conformance	The Entity's assessment of the legal requirements regarding wooden packaging material as well as the biodiversity assessment, which included the aspect of Alien Species, did not identify any need for action. During the Entity's thermal processing of the Aluminium Scrap, all species, that might be brought to the site and are hiding in the Scrap, are destroyed. Products are shipped only within Europe.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity does not operate or plan to explore or develop new projects in or close to World Heritage Properties. The Entity's production site is located in Santana, Romania in an established industrial zone.
8.6a-d Protected Areas	Conformance	A Protected Area (Natura 2000) is situated in the vicinity of the site. An emissions dispersion study from the University of Timisoara (2022) concluded that the impact from emissions on the Entity's Area of Influence was insignificant. Therefore, a plan to manage and/or minimise the impact is not required.
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		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The HAI Group has issued its Codes of Conduct for employees and suppliers, expressing a commitment to respect Human Rights. These documents have been communicated to employees (notice boards, employee training, intranet) and other Stakeholders (letters, internet).</p> <p>The Codes can be accessed at: https://www.hai-aluminium.com/en/downloads</p> <p>The Entity has conducted a documented comprehensive Human Rights Due Diligence assessment but consultation of external Stakeholders was not systematic.</p> <p>The assessment has confirmed that there are no salient adverse Human Rights impacts present at the audited site. Indigenous Peoples are not present in the region or the Area of Influence of the Entity.</p> <p>However, the situation of women in the country and the situation of minorities, especially Hungarians and Roma has not been adequately considered in the assessment.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women's rights requirements. During interviews and document review, no indication of deliberate Discrimination against women was observed. However, only nine out of 121 employees are female, with the physicality of many roles potentially being a barrier to greater female participation. In accordance with National Law, the Entity grants up to two years of paid maternity leave.</p> <p>The Entity's program to promote gender equity and women's empowerment however has not yet been documented nor made publicly available.</p>
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 present where they operate (i.e. Eastern Europe).
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 present where they operate (i.e. Eastern Europe).
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 present where they operate (i.e. Eastern Europe).
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage sites within the Area of Influence.
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 present where they operate.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements have taken place during the period since joining ASI, nor are expected to occur during the Certification Period.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no Material impacts to any Local Communities and therefore no need for action.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity is not located in or near Conflict-Affected or High-Risk Areas (CAHRAs). The Entity follows the definition of CAHRAs from the 'Armed Conflict Location Event Data Project' (www.acleddata.com) and Peace Direct (www.peacedirect.org). According to the list of suppliers, there is no supply from a CAHRA. Metal supply is completely managed from the Headquarters in Ranshofen (Austria). All new suppliers undergo a Due Diligence process. During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in CAHRAs.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Through the HAI Group, the Entity has developed standards for its supply chain in place, which clearly define rules and expectations for suppliers, Contractors, and others with whom they do business. The HAI group 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 basic strategy to respond to identified risks in their supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Performance Standard Re-Certification Audit has fulfilled the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has a supply chain Due Diligence process in place, however, it has not yet adequately reported about this process and its results.
9.9 Security practice	Conformance	The Entity does not employ armed security forces. The Entity's Human Rights risk assessment did not identify specific risks related to security practices. During the Audit, no such risks were identified.
10. Labour Rights		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	As confirmed by interviews with Workers and management as well as via document review, the Entity respects the rights of Workers to unite freely in Trade Unions, seek representation and join the Workers Council without interference. A freely elected Worker representation is in place. A Trade Union however is not currently represented at the Entity. The Entity does respect the right of Collective Bargaining. Worker representatives and management negotiated a comprehensive Collective Bargaining Agreement (CBA) site level.

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		The HAI Group supports the Labour Rights as defined by the International Labor Organization (ILO), as per its Code of Conduct: https://www.hai-aluminium.com/downloads
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 Applicable Law allows for the right to Freedom of Association and Collective Bargaining in Romania.
10.2a Child Labour	Conformance	<p>As per the Entity's Code of Conduct, Child Labour is prohibited. Refer to: https://www.hai-aluminium.com/downloads</p> <p>The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. Young Workers are not engaged in hazardous work. At the time of the Audit, the youngest Worker was 22 years old. There are robust practices in place to ensure that children are not employed.</p>
10.3a-c Forced Labour	Conformance	<p>Interviews, document review and a site tour confirmed that the Entity does neither engage in nor support the use of Forced Labour. The Entity also does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.</p> <p>The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies. Interviews with Workers, their representatives and management confirmed that the Entity does not require Workers to lodge deposits or security payments at any time, does not hold Workers in Debt Bondage, nor force them to work to pay off a debt as well as it does not unreasonably restrict the freedom of movement of Workers in the workplace. The Entity does not offer on-site housing.</p> <p>Interviews with management and Workers as well as document review confirmed that the Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. Interviews with management and Workers confirmed that the Entity does not deny Workers the freedom to terminate their employment at any time without penalty and give notice of a reasonable length.</p> <p>The HAI Group has issued and made publicly available its 'Modern Slavery Statement' which is accessible at: https://www.hai-aluminium.com/downloads</p>
10.4a-c Non-Discrimination	Conformance	Interviews with Workers, Worker representatives and management as well as a document review confirmed that the Entity does not deliberately discriminate. There are no females in production currently, as no women applied for relevant jobs. The Entity's management assumes that this is due to the type and nature of the business (e.g. shift work in the Casthouse).
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment. Various communication channels are in

CRITERION	RATING	COMMENT
		place, such as regular shift meetings, frequent discussions with Worker representatives, annual employee surveys and an employee magazine.
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual harassment, or verbal abuse of Workers. A formal procedure is in place to manage grievances.</p> <p>The HAI Group has issued a 'Guideline on Harassment' which serves as the Entity's policy on the topics of Violence and Harassment at the workplace. However, this document has not been made publicly available.</p>
10.7a-d Remuneration	Conformance	<p>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, as confirmed by document review and Worker interviews. The wages paid are substantially above the legal minimum. Working Time, payment and leave are negotiated in a site-specific Collective Bargaining Agreement.</p> <p>Monthly payments to Workers are made in full by the Entity via bank transfers. Workers receive pay slips which list in detail all necessary information about hours worked, surcharges and deductions.</p>
10.8a-c Working Time	Conformance	<p>As confirmed by interviews with Workers, Worker representative and management, the Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the site-specific Collective Bargaining agreement. Electronic time recording is in place.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity's Workers are informed on Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the Code of Conduct and the HAI Group's Corporate Social Responsibility Policy.</p>
11. Occupational Health and Safety		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified.</p> <p>The latest Audit Report (2024) did not identify any non-conformities.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified and management reviews are undertaken annually.</p> <p>The HAI Group has issued an addendum to its Sustainability Report 2023, where leading and lagging indicators for its ASI Certified sites are made publicly available. The report can be accessed at: https://www.hai-aluminium.com/wp-content/uploads/2024/09/Addendum_NHB_2023.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a joint Health and Safety Committee, which meets every quarter. Additional mechanisms have been implemented, including interdepartmental workshops, where Workers</p>

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		can raise, discuss and participate in the resolution of OH&S issues with management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 November 2020	Issued (Provisional Certification)
1	11 November 2021	Surveillance audit - Full Certification
2	6 June 2023	Surveillance Audit
3	11 November 2024	Re-Certification and Scope Change Audit - Full Certification. Scope Change to apply ASI PS V3.