

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hammerer Aluminium Industries Extrusion Germany GmbH

CERTIFICATE NUMBER

382

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

TÜV RHEINLAND CERT
GMBH

DATE OF ISSUE

22 AUGUST 2024

DATE OF EXPIRY

21 AUGUST 2025

CERTIFIED SINCE

22 AUGUST 2024

AUTHORISED BY

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 of extruded Aluminium profiles, fabricated and surface-treated Aluminium profiles, fabricated and welded Aluminium components located at Soest, Germany.

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion Germany GmbH
CERTIFICATION SCOPE	Production of extruded Aluminium profiles, fabricated and surface-treated Aluminium profiles, fabricated and welded Aluminium components located at Soest, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">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">5 – 9 February 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">24 June 2024
AUDIT SCOPE	<p>The Audit Scope included the whole production site HAI Extrusion Germany GmbH located in Soest, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	22 August 2024 – 21 August 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 22 February 2025

CERTIFICATE NUMBER 382



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 Group, headquartered in Ranshofen/Braunau (Upper Austria) produces complete Aluminium solutions (Aluminum extrusion profiles machined and unmachined and processed products) for the transport, building and construction, electrical and mechanical engineering and plant engineering sectors. Hammerer Aluminium Industries (HAI) (the 'Entity') has existed in this form since 2007 and has achieved significant growth in recent years.

The site is equipped with three direct extrusion presses, offering press forces ranging from 2,200 to 4,400 tonnes. Additionally, it features advanced milling capabilities, gas-shielded welding, mechanical joining and riveting, precision cutting, specialised machinery, and a prototyping area.

In the seventeen years since the Entity was founded, it has expanded to eight facilities located in four countries. The annual tonnage processed has increased to 25,000 tonnes, and the turnover has multiplied from 110 million euros to approximately 900 million in 2023. The team has expanded from 350 to approximately 2,000 employees.

HAI offers innovative solutions made of Aluminum covering the entire value chain from recycled input material to sophisticated profiles and complex components, taking into account all sustainability aspects. The Entity relies on 'state-of-the-art' production Facilities and comprehensive research and development, especially with regard to new alloys.

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	Low	Low	LOW
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Low	Low	LOW
OVERALL	LOW			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has implemented processes to identify, evaluate and comply with legal requirements and other binding obligations. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body: https://www.hai-aluminium.com/en/download-center</p> <p>Systems are implemented (e.g., a legal database) to maintain awareness of, and ensure compliance with Applicable Law. HAI Headquarters supports the Entity with legal counsel.</p> <p>However, the Entity's system to maintain awareness of, and to ensure Compliance with Applicable Law is incomplete, as it lacks a documented procedure that defines responsibilities and the legal compliance process.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms and has implemented a Code Of Conduct (https://www.hai-aluminium.com/en/download-center) which is communicated internally and externally. The Entity has provided training to employees on business ethics. The HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852</p> <p>An external tax auditor periodically audits the financial system.</p>
1.3a-e Code of Conduct	Conformance	<p>The Code of Conduct has been issued and communicated internally and externally: https://www.hai-aluminium.com/downloads</p> <p>The Code covers mutual trust, sustainable business relationships, independence and integrity, fair and safe working conditions, environment, energy, and sustainability. The Code is regularly reviewed and was last reviewed in January 2023.</p> <p>The Entity has provided training to employees with regard to business ethics. The HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has issued and published its Corporate Social Responsibility Policy and a separate Environmental, Energy, Occupational Health & Safety Policy, both are available at: https://www.hai-aluminium.com/en/download-center</p> <p>The Entity has also issued its Code of Conduct for employees and suppliers. The documents are endorsed by the group's senior management. The Entity is certified against the ISO 14001, ISO 45001, ISO 50001, ISO 9001 and IATF16949 Management System standards.</p>
2.2a-c Leadership	Conformance	<p>The Entity's Managing Director has the overall responsibility and authority for ensuring conformance with the ASI Performance</p>

CRITERION	RATING	COMMENT
		Standard, leading the communication of the Entity's Policies and providing sufficient resources to support its implementation. Responsibilities are reflected in the organisational chart.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System which has also been checked and certified according to ISO 14001:2015. The certificate is available at: https://www.hai-aluminium.com/en/download-center
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	Whilst the Entity demonstrated compliance with social regulations and principles with some processes documented, however a documented framework for all relevant social rules and activities has not been developed and as such there is an inadequate description of processes and responsibilities, KPIs, Goals and associated action plan.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented and disclosed their Sourcing Policy (Code of Conduct for Suppliers): https://www.hai-aluminium.com/en/download-center The Entity's sourcing process is documented, and regular Due Diligence and supplier evaluations are undertaken.
2.5a-g Environmental and Social Impact Assessments	Major Non-Conformance	Since the Entity joined ASI, the Entity has commenced two building projects, a new production hall and a new office building. The Entity did not demonstrate that it has evaluated the need for environmental and social Impact Assessments. It also did not provide a documented procedure for such assessments.
2.6a-h Human Rights Impact Assessment	Major Non-Conformance	Since the Entity joined ASI, the Entity has commenced two building projects, a new production hall and a new office building. The Entity did not demonstrate that it has evaluated the need for environmental and social Impact Assessments. It also did not provide a documented procedure for such assessments.
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity has implemented a site-specific emergency response plan. The plan was developed in collaboration with relevant Stakeholders such as the fire brigade. The plan is available to relevant Stakeholders on request. However, the Entity has not demonstrated that evacuation drills are carried out to an appropriate extent and frequency, as neither has been determined via a job hazard analysis, which is a requirement of the relevant local workplace regulation.
2.8a-d Suspended Operations	Minor Non-Conformance	The Entity has addressed environmental impacts of normal and abnormal situations as part of its ISO 14001 certified Environmental Management System. Due to the nature of the business (extrusion), the environmental impacts of a suspended operation appear to have limited impact. At the time of the audit, a documented business resilience plan had not yet been established and the emergency plan does not include information in the event of suspended operations.
2.9a-b Mergers and Acquisitions	Conformance	The Entity's management confirmed that it has not undergone nor has plans for any merger or acquisition (M&A) activity since they have joined ASI. However, the HAI Group has a documented process to

CRITERION	RATING	COMMENT
		manage M&As. In 2023, HAI Group established a Joint Venture with the Korean company LS C&S.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. There have been no such events since 2015 when HAI Group acquired the site.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts via the Sustainability Report, which has been developed based on the reporting standard of the Global Reporting Initiative: The Report is available at: https://www.hai-aluminium.com/en/download-center
3.2 Non-compliance and Liabilities	Conformance	No significant fines, judgments, penalties and non-monetary sanctions were enforced during 2022. More information is included in the Sustainability Report 2022, page 22: https://www.hai-aluminium.com/en/download-center
3.3a-c Payments to Governments	Minor Non-Conformance	The Entity (via the HAI Group) has not publicly disclosed the value and beneficiaries of financial and in-kind political contributions, whether made directly or through an intermediary, on an annual basis or via existing audit and assurance systems.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity's Code of Conduct (see https://www.hai-aluminium.com/en/download-center) includes the contact details of the legal counsel and is made available to Stakeholders.</p> <p>Similarly, the Sustainability Report 2022 (page 22) includes a dedicated email address for Stakeholders to raise their concerns: ethics@hai-aluminium.com</p> <p>The Entity did not receive any complaints or grievances in 2022.</p> <p>A whistleblower hotline is also in place and a description of the mechanism is available on the dedicated website: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852</p> <p>However, the hotline is only intended to receive reports relating to ethical misconduct. There is a lack of a publicly available description and information on the mechanism for other complaint types.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has evaluated the life cycle impacts of its major Products in a Life Cycle Assessment (LCA), which meets ISO 14040/14044 requirements. The study was developed by a specialised external institute. The study is not publicly available, however, the Entity provides LCA information upon request.</p> <p>The LCA only provides the global warming potential (in kg CO₂eq /kg extruded Aluminium) information and currently does not include or consider other impact categories.</p>

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4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity confirmed that it will provide adequate 'cradle-to-gate' life cycle information upon customer request. HAI Group ensures that any public communication on LCA will include public access to the LCA information and its underlying assumptions, including system boundaries.
4.2 Product Design	Not Applicable	This Criterion is not applicable as the Entity has no design responsibility, as the Entity's customers (both for extrusion and processing departments) specify all design requirements.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented systems and a program to recycle 100% of its Aluminium Process Scrap within its operations, within the HAI Group or with external partners. The Entity has achieved close to a 100% recycling rate of Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity's recycling strategy is driven by HAI Group's remelting/Casting plants, which are collecting the Aluminium Scrap (including the end-of-life products) for its own melting and Casting production. Approximately, 80% of Aluminium is secondary material, as disclosed in the Sustainability Report 2022, pages 29-30: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>HAI group actively contributes to the circular economy and not only recycles its internal Scrap, but also purchases secondary Aluminium.</p> <p>However, a documented recycling strategy specific to the Entity, including specific timelines, activities and targets is not made publicly available.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	As a manufacturer of automotive parts, the Entity supplies to other businesses (i.e. 'B2B') with their Products, but not to consumers (i.e. B2C). However, the Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products, and works with national and international Scrap dealers to secure the material for their remelting/Casting plants.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has disclosed its Greenhouse Gases (GHG) emissions and energy use by source in its Sustainability Report 2022, pages 31-33: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>However, the Scope GHG 3 Emissions data is not disclosed, and the GHG data have not been independently verified by a third party before publication. They were verified by the Entity's Managing Director prior to publication.</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 -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a-e Ghg Emissions Reduction Plans	Conformance	<p>The Entity via the HAI Group has established both a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway. Both are publicly available in the Sustainability Report 2022, pages 31-37: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>Note: The plan and pathway were established and published prior to the availability of an ASI endorsed methodology. The progress against the pathway is also presented (graphic illustration in the reduction pathway). The GHG Emissions Reduction Pathway also includes Intermediate Targets (2025, 2025 and 2045).</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity demonstrated that a system and processes are in place to implement its GHG reduction targets. The GHG Management System is integrated into the Entity's Environmental Management System, which is certified to ISO 14001 and ISO 50001.</p> <p>The Sustainability Report 2022 states that the Entity's Scope 2 emissions are at 0 CO₂e kg/1 t Al, (refer to page 33): https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has disclosed their CO₂ emissions, which are available in the Sustainability Report 2022, page 33: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>However, other Material emissions, especially carbon monoxide (CO) and oxides of nitrogen(NO_x), are not publicly disclosed.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity directly discharges its stormwater to the receiving waters of Schledde Creek. Effluents are discharged into the publicly owned treatment works. The Entity has disclosed its consumption of water in its Sustainability Report 2022, page 38: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>A plan to minimise potential impacts from Discharges to Water is not required as the risk and impacts have been rated low (annual consumption in 2022 was approximately 14,000 cubic meters per year).</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>Within the scope of its ISO14001 certified Environmental Management System, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakages may contaminate air, water, or soil. The Entity has established and implemented a management plan, communication plans, compliance controls and a monitoring programme to prevent and detect Spills and Leakages.</p> <p>The Entity does not currently need to disclose a management plan to remediate Spills and Leakages, as the risk has been identified as low. However, when Spills or Leakages occur, the Entity will report them annually via the Sustainability Report. Disclosure on Spills and Leakages for the HAI Group are included in the in the Sustainability</p>

CRITERION	RATING	COMMENT
		Report 2022, page 39: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	When Spills or Leakages occur, the Entity will report them annually via their Sustainability Report. Disclosure on Spills and Leakages for the HAI Group are included in the Sustainability Report 2022, page 39: https://www.hai-aluminium.com/downloads
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has implemented a waste management strategy in line with its ISO 14001 certification. Different types of Scrap and waste (such as Hazardous Waste, recyclable waste, and Aluminium) are segregated and disposed of, treated or recycled in accordance with local law. The Entity did not provide a documented assessment to identify and evaluate the impact on humans and the environment of the generated waste.</p> <p>The Entity via the HAI Group reports about the generated quantities of Hazardous and Non-Hazardous Waste In its Sustainability Report, page 40: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>However, the waste management strategy, including specific timelines, activities and targets was not yet documented.</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	Minor Non-Conformance	<p>The Entity has publicly disclosed its water consumption in the Sustainability Report 2022, page 38: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf</p> <p>However, the Entity did not provide evidence for an assessment of water-related risks in Watersheds in the Area of Influence.</p>
7.2a-e Water Management	Minor Non-Conformance	The Entity has not developed a formal water assessment regarding risk to the watersheds.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	External experts have conducted a Biodiversity assessment which assessed the impact of the Entity's operations on the local environment in regard to the Biodiversity and Ecosystem Services as very low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as based on the assessment performed by an external specialised service provider, the Entity's impact on Biodiversity and Ecosystem Services are 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.

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8.2a-g Biodiversity Management	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 Biodiversity and Ecosystem Services are rated as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as no Priority Ecosystem Services were identified in the recent Biodiversity and Ecosystem Services assessment.
8.4 Alien Species	Conformance	During the Entity's processing of the Aluminium, all foreign species are destroyed. Relevant remaining risks identified by the Entity are from the wooden pallets, which are used for shipping over longer distances they are treated according to the International Standards for Phytosanitary Measures No. 15 (ISPM 15) to eliminate that risk.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not operate, plan to explore or develop New Projects in or close to World Heritage Properties. The Entity's production site is located in Soest, Germany which is a long-established industrial zone.
8.6a-d Protected Areas	Minor Non-Conformance	In January 2024, a Biodiversity and Ecosystem Services assessment confirmed the presence of Protected Areas near the site. However, at the time of the Audit, the Entity had not implemented a management plan to ensure that their activities and Facilities do not negatively impact the area's special values, including Protected Areas. As a result, the management plan was not publicly available.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity's Code of Conduct includes a commitment to support and respect Human Rights as defined by the UN Human Rights Conventions: https://www.hai-aluminium.com/en/download-center The Entity has conducted a documented gender-sensitive Human Rights Due Diligence assessment. The assessment confirmed no salient adverse issues regarding Human Rights, and the Entity is embedded within the community.
9.2a-e Gender Equity and Women's Empowerment	Major Non-Conformance	The Entity has developed and implemented policies and processes that conform to gender equity and women's empowerment requirements. Interviews and document reviews confirm there is no indication of deliberate Discrimination against women. The Entity via the HAI Group reports publicly on gender diversity indicators including the number of female/male Workers via the Sustainability Report 2022, pages 54-59: https://www.hai-aluminium.com/wp-content/uploads/2023/06/SUSTAINABILITY-REPORT-2022-EN.pdf However, the Entity does not have an appropriate program to promote gender equity and women's empowerment in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.

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9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
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, as Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has assessed for the presence of sacred or cultural heritage sites and values within their Area of Influence, however none have been identified. In addition, Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Also, Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as confirmed by interviews, the Entity did not require people to resettle or to be displaced. The Entity's senior management confirmed there are no plans for New Projects or Major Changes that would require resettlements.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable, as the outcome of the stakeholder assessment has confirmed that there are no salient issues with Local Communities and therefore no need for action.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented processes to ensure risk-based Due Diligence over its Aluminium supply chain. Management regularly conducts documented risk assessments, the latest assessment confirmed that the Entity is not sourcing from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has standards for its supply chain in place, which clearly define the rules and expectations for suppliers, Contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a basic strategy to respond to identify risks in their supply chain. As a final stage in the process, the Entity may terminate Business Activities with the supplier.
9.8d Conflict-Affected and High-Risk Areas - Audit of Due Diligence	Conformance	The Entity was audited against the ASI Performance Standard which includes an audit on Due Diligence processes and as such addresses this requirement of the Standard.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst the Entity has implemented supply chain Due Diligence processes, it has not publicly reported the process and results annually.
9.9 Security practice	Conformance	The Entity does not use armed security forces. Security personnel on site are used primarily as gatekeepers. A Human Rights risk assessment found no relevant risks related to security practices. Worker interviews confirmed no known Human Rights incidents caused by the security service.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity supports labour rights as defined by the International Labour Organization (ILO). Refer to the Entity's Code of Conduct and Corporate Social Responsibility Policy: https://www.hai-aluminium.com/en/download-center</p> <p>The Entity is committed to respecting the Freedom of Association and the right to Collective Bargaining of all employees within the framework of applicable national laws and regulations. A freely elected worker representation is in place. Worker representatives confirmed that the Entity respects the rights of Workers to Collective Bargaining. Collective Bargaining Agreements are negotiated at the industry level and site level are in place.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the right to Freedom of Association and Collective Bargaining is not restricted in Germany where the Entity operates.
10.2a Child Labour	Conformance	The Entity neither use nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest person was an apprentice who was 15 years old. Those young people receive vocational training which is regulated in official training plans. An internally qualified instructor ensures that the work of the apprentices is not exploitive, hazardous or interfering with schooling and apprenticeship programs. The Entity has robust practices to ensure that children are not employed.
10.3a-c Forced Labour	Major Non-Conformance	There was no evidence for a documented risk assessment regarding Forced Labour. The Entity has not developed nor issued a publicly available Modern Slavery Statement. However, a site tour and interviews with Workers and Human Resources, as well as document review, gave no indications of Forced Labour, slavery or Human Trafficking.
10.4a-c Non-Discrimination	Minor Non-Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Code Of Conduct: https://www.hai-aluminium.com/en/download-center</p> <p>The Entity does not engage in, nor support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to Discrimination. This was confirmed through interviews and</p>

CRITERION	RATING	COMMENT
		<p>document review. Employees receive diversity and anti-Discrimination training.</p> <p>However, the Entity's measures to avoid or reduce Discrimination are not fully effective, as the office building under construction at the time of the Audit was not planned to be accessible (e.g. no disabled toilet).</p>
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment. There are weekly meetings held between Human Resources and the Works Council and between the Plant Manager and the Works Council. Additionally, there are quarterly meetings, Health and Safety Committee meetings, and two town hall meetings held annually.
10.6a-g Violence and Harassment	Conformance	As confirmed via interviews and document review, 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, see Corporate Social Responsibility Policy: https://www.hai-aluminium.com/en/download-center
10.7a-c Remuneration	Conformance	All Workers are provided with a written contract at the beginning of their employment. The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. Wages paid are above the living wage and in line with national industry standards. Overtime is paid with a premium of at least an additional 25%.
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 incorporated into the Collective Bargaining Agreement and all employment contracts.
10.9a-b Informing Workers of Rights	Minor Non-Conformance	<p>As confirmed by interviews with Workers and Human Resources management during the audit, 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> <p>However, labour laws that require notice (posting) have not been posted. There are protective regulations, such as laws and ordinances, that employers must display at their company for all employees. These regulations are intended to inform employees of their rights in the workplace.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has an Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified. The Entity has implemented and communicated its Environmental, Energy, Health and Safety Management Policy. Both the certificate and the Policy are publicly available at: https://www.hai-aluminium.com/en/download-center

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity has an Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified. The Entity has defined and is monitoring OHS-related leading and lagging performance indicators. However, these indicators have not yet been made publicly available.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a joint Health and Safety Committee, by which Workers can raise, discuss and participate in the resolution of OH&S issues with management. Agendas and meeting minutes were readily on hand during the Audit.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 August 2024	Initial Certification Audit – Provisional Certification
1	17 January 2025	Revised design for Provisional certificates (page 1)