

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Speira Rolling and Speira Recycling Services Germany

CERTIFICATE NUMBER
20

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
13 MARCH 2025

DATE OF EXPIRY
12 MARCH 2026

CERTIFIED SINCE
13 MARCH 2019

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

Rolling mill facilities at Speira Rolling Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Holmestrand (Norway) and Karmøy (Norway), and the Speira Corporate Office (Grevenbroich).

Recycling of Aluminium scrap and production of wrought and foundry alloys according to customer specification at Speira Recycling Services Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by Speira Recycling Services Germany GmbH Headquarters in Grevenbroich (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	Speira
ENTITY NAME	Speira Rolling and Speira Recycling Services Germany
CERTIFICATION SCOPE	<p>Rolling mill facilities at Speira Rolling Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Holmestrand (Norway) and Karmøy (Norway), and the Speira Corporate Office (Grevenbroich).</p> <p>Recycling of Aluminium scrap and production of wrought and foundry alloys according to customer specification at Speira Recycling Services Grevenbroich (Germany), Deizisau (Germany) and Töging (Germany), plus central strategic, administrative, and service functions managed by Speira Recycling Services Germany GmbH Headquarters in Grevenbroich (Germany).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (10 October 2018 – 20 February 2019)Scope Change Audit (11 December 2019 – 12 December 2019)Re-Certification and Scope Change Audit (24 May 2022 – 1 September 2022)Re-Certification Audit and Scope Change (28 October – 21 November 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">10 October 2018 – 20 February 2019 (Initial Certification Audit)11 December 2019 – 12 December 2019 (Scope Change Audit)24 May 2022 – 1 September 2022 (Re-Certification and Scope Change Audit)28 October – 21 November 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 July 2019 (Initial Certification Audit)4 March 2020 (Scope Change Audit)12 October 2022 (Re-Certification and Scope Change Audit)16 January 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 October 2018 – 20 February 2019)</u></p> <p>The Audit Scope covered Grevenbroich, Hamburg and Rheinwerk/Neuss (Germany), Karmøy (Norway), and the corporate office (Norway).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses

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- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

First Scope Change Audit (11 December 2019 – 12 December 2019)

The Audit Scope covered covered the site in Holmestrand, Norway.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification and Second Scope Change Audit (24 May 2022 – 1 September 2022)

The Audit Scope covered site operations at Grevenbroich, Hamburg, and Rheinwerk (Germany), Karmøy and Holmestrand (Norway), along with Speira's corporate operations (Germany).

The ASI Multi-Site sampling approach was undertaken to include the production sites located in Grevenbroich, Rheinwerk/Neuss, and Karmøy as well as Speira Headquarters.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (28 October – 21 November 2024)

The Audit Scope covered the Speira Rolling operations at Speira Rolling Grevenbroich and Holmestrand, and the Speira Corporate Office, and the Speira Recycling Services Germany GmbH operations at Speira Recycling Services (Grevenbroich) and Töging, and the Speira Recycling Services Germany Headquarters.

The ASI Multi-Site sampling approach was undertaken and the Speira Rolling sites at Hamburg, Karmøy and Rheinwerk/Neuss, and the Speira Recycling Services Germany GmbH site at Deizisau, were not visited as part of the Audit Scope. During the Audit it was identified that the Management Systems for Speira Rolling and Speira Recycling Services Germany GmbH were currently not fully aligned, and Speira's rolling mills in Germany and Norway had different Management Systems, which limited the Audit Team obtaining a complete overview of the Entity's systems and procedures.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Provisional 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.
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- ☑ 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.
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CERTIFICATION PERIOD 13 March 2025 – 12 March 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 12 September 2025

CERTIFICATE NUMBER 20



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

Speira (the 'Entity') delivers high quality, low carbon products based on rolling and recycling capabilities and consists of Speira rolling mills sites in Germany and Norway and Speira Recycling Services remelting facilities in Germany. The Entity was formed in 2023 through the merger of Speira rolling mills and the former Real Alloy Europe. The production sites include surface treatment lines, annealing lines, hot mills, cold mills, remelting furnaces, casting furnaces and casthouses. The Entity's oldest sites commenced production in 1917. The Entity serves sectors such as automotive, shipping and transport, battery systems, building, beverage cans and packaging. The Entity recycles up to 650,000 tonnes of Aluminium per annum and produces around one million tonnes of advanced rolled products.

The supply chain activities and approximate number of Workers at each of the Entity's sites includes:

- Speira Rolling:
 - Speira Grevenbroich - Semi-Fabrication, with 2,000 Workers
 - Hamburg - Aluminium Re-melting/Refining, Casthouses, and Semi-Fabrication, with 600 Workers
 - Holmestrand - Aluminium Re-melting/Refining, Casthouses, and Semi-Fabrication, with 430 Workers
 - Karmøy - Semi-Fabrication, with 200 Workers
 - Rheinwerk/Neuss - Aluminium Re-melting/Refining and Casthouses, with 150 Workers
 - Speira Corporate Office - 6,000 Workers.
- Speira Recycling Services Germany GmbH:
 - Deizisau - Aluminium Re-melting/Refining and Casthouses, with 65 Workers
 - Töging - Aluminium Re-melting/Refining and Casthouses, with 180 Workers
 - Speira Recycling Services Germany Grevenbroich - Aluminium Re-melting/Refining and Casthouses, with 165 Workers
 - Speira Recycling Services Germany Headquarters - Aluminium Re-melting/Refining and Casthouses, with 50 Workers.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	High	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has systems in place to maintain awareness of and ensure Compliance with Applicable Law. The Entity has developed and implemented Policies, systems, procedures and processes that conform to the legal compliance requirements, including through subscription to legal services for updates and working with national and international associations. Certifications are available at: https://www.speira.com/downloads/certifications/</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including extortion and Bribery, consistent with Applicable Law and prevailing international standards. An anti-Corruption policy and integrity program have been developed and implemented in the organisation through training and compliance activities. The anti-Corruption statement is included in the Code of Conduct, available at: https://www.speira.com/media/celdpfpe/speira-code-of-conduct.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to Environmental, Social and Governance (ESG) performance. The Code of Conduct is mandatory to all employees. The Entity has issued and communicated its Code of Conduct, accessible at: https://www.speira.com/media/celdpfpe/speira-code-of-conduct.pdf</p> <p>The Code of Conduct is reviewed regularly to reflect any changes in the business and on any indication of a control gap.</p> <p>The Entity has two Policy documents for Speira Rolling and Speira Recycling Services Germany respectively, available at: https://www.speira.com/media/tqwban2b/speira-policy-en.pdf https://www.speira.com/media/k2xacvqz/speira-recycling-services-policy-en.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented integrated Environmental, Social and Governance Policies for the two companies Speira Rolling and Speira Recycling Services (SRS) respectively, published on their respective websites. The Entity has issued and communicated internally and externally company Policy statements addressing environmental, health and safety and governance aspects. There is senior management endorsement and support through the provision of resources and regular review of the Policies established for Speira Rolling and Speira Recycling Services Germany: https://www.speira.com/downloads/terms-and-conditions-and-policies/ https://www.speira.com/media/k2xacvqz/speira-recycling-services-policy-en.pdf</p> <p>The Policies and procedures are reviewed and updated on a regular basis, and all corporate Policies and procedures have received senior management approval.</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. The Entity's Head of Communications, Marketing and Sustainability in Speira is responsible for ASI-related conformance, supported by the Head of Sustainability in Speira Recycling Services Germany.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented Integrated Management Systems for Speira Rolling and for Speira Recycling Services Germany, respectively. All sites in the two units are certified according to ISO 14001:2015 (environment) and all German sites are certified according to ISO 50001:2018 (energy). All sites have operational permits from relevant authorities in both Germany and Norway and are subject to audits from Government bodies on a regular basis.
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems in Speira Rolling and Speira Recycling Services respectively. Issues relating to Occupational Health and Safety and Labour Rights are systematically managed, however processes for assessing social risks and human risks were not documented at time of the Audit. The Entity holds certificates in accordance with ISO 45001: Occupational Health and Safety Management system for all sites. The certificates are published on the website: https://www.speira.com/downloads/certifications/
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented responsible sourcing Policies, covering environmental, social and governance issues, published and available at: https://www.speira.com/media/0znkvoil/speiras-sustainable-sourcing-policy-2024.pdf https://www.speira.com/media/facduedx/sustainable-supply-chain-policy-speira-recycling-services.pdf The Supplier Code of Conduct is available at: https://www.speira.com/media/ksyen141/supplier-code-of-conduct_2024_en.pdf
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity has established processes and procedures for conducting Environmental and Social Impact Assessments for all New Projects and Major Changes to existing Facilities. There have been many changes to the business in recent years, including the merger of Speira GmbH and Real Alloy Europe/ Speira Recycling Services in 2023, – a process which is still ongoing. Another relevant Major Project includes the current installation of a new furnace in the foundry at the Holmestrand site. Impact Assessments and management plans are shared with relevant authorities and stakeholders in Germany and Norway, and information has been published via news articles and newspapers. These Impact Assessments however have not been publicly disclosed.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	The Entity has established processes and procedures for conducting Human Rights Impact Assessments, including a gender analysis, for all New Projects and Major Changes to existing Facilities. The most recent Major Change to the business was the merger between Speira GmbH and Real Alloy Europe, now known as Speira Recycling Services, (from

CRITERION	RATING	COMMENT
		2023 onwards). The Impact Assessments and management plans have been shared with relevant authorities in Germany and Norway. These Impact Assessments however have not been publicly disclosed.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site-specific Emergency Response Plans in collaboration with potentially affected Stakeholder groups such as Local Communities, employees and their representatives, and relevant local emergency services. Information to neighbours and Stakeholders has been published on local websites. The Entity holds valid ISO 14001 and ISO 45001 certificates which are current to the Entity's Certification Scope.
2.8a-d Suspended Operations	Conformance	Processes and procedures have been established to manage any changes in operations, including suspended operations, to ensure that requirements in Applicable Law and cooperation with employee representatives are addressed and adhered to. Assessment of Material adverse environmental, social and governance impacts are included as part of the operational permits for all production sites. Recent changes include the closing of smelting operations of Speira and facilities sold from Real Alloy Europe as part of the merger of Speira and Speira Recycling Services Germany.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues as part of its Due Diligence process for mergers and acquisitions. Progress on impacts and alignment of the merger of Speira and Real Alloy Europe/Speira Recycling Services Germany was shared with employees, Works Councils and local authorities.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a formal procedure for any situation where closure, decommissioning or divestment of any part of its operation would be relevant. Relevant projects and changes, including closure and decommissioning, must undergo a thorough analysis and authorisation process and the Entity has implemented systems to manage this effectively in collaboration with affected Local Communities and authorities. Provisions for closing a site are regulated in the respective operating permits. The Entity's Board has the ultimate responsibility for closure and decommissioning.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Major Non-Conformance	Speira Rolling has publicly disclosed its governance approach to its environmental, social and economic impacts, which is available at: https://www.speira.com/media/tqwban2b/speira-policy-en.pdf Each of the production sites monitors its performance closely and reports annually to German and Norwegian national government bodies where the information can be found on public webpages. Speira Recycling Services (formerly Real Alloy Europe) has published a Sustainability Report for 2021 that includes ad-hoc updates on its performance for 2023. This Report is available at: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report However, Speira Rolling has not disclosed its Material environmental, social and economic impacts for 2021, 2022 or 2023 on a site-specific nor aggregated level.

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Minor Non-Conformance	Speira Rolling has not published information on non-compliance and liabilities for its operations for 2021-2023. However, as confirmed by the Entity's management, no fines, judgments, penalties, or non-monetary sanctions have been issued to any of the Entity's operations during recent years.
3.3a-c Payments to Governments	Conformance	The Entity only makes, or has made payments to Governments on a legal and/or contractual basis, and are made in accordance to the Entity's Policy statements published on its website: https://www.speira.com/downloads/terms-and-conditions-and-policies According to the Entity's annual financial audits, as well as confirmation provided by its management, all payments to Governments were made on a legal and/or contractual basis.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established the Complaints Resolution Mechanism 'Speira Speakup' to address Stakeholder complaints, grievances and requests for information relating to its operations. Speira Speakup is available at: https://www.speira.com/feedback-concerns
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Product lines for which Primary and Recycled Aluminium is used. For instance, through 'cradle-to-gate' Life Cycle Assessment (LCA) studies performed by independent institutions or according to customers' expectations and needs. Environmental Product Declarations (EPDs) for the Norwegian sites (Holmestrand and Karmøy) are available at: https://www.epd-norge.no LCA information for low-carbon products is published at: https://www.speira.com/sustainability/low-carbon-aluminium LCA information on product lines with recycled material is available at: https://www.speira.com/sustainability/recycled-aluminium
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has publicly communicated LCA information through its EPDs. The EPDs developed for the Norwegian sites (Holmestrand and Karmøy) are published at the following webpages: www.epd-norge.no https://www.epd-norge.no/epd-soekerresultat/?q=Speira&categoryID=376 LCA information for low-carbon qualities is published at: https://www.speira.com/sustainability/low-carbon-aluminium LCA information on product lines with recycled material is available at: https://www.speira.com/sustainability/recycled-aluminium
4.2 Product Design	Conformance	The Entity has integrated clear objectives in the design and development process for Products and components to enhance their sustainability, including the environmental life cycle impacts of the Products. Product lines for low-carbon Aluminium and Recycled Aluminium have been developed, available at: https://www.speira.com/sustainability/low-carbon-aluminium

CRITERION	RATING	COMMENT
		<p>https://www.speira.com/sustainability/recycled-aluminium</p> <p>Speira Recycling Services delivers Recycled Aluminium metal to its customers.</p>
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established strategies, procedures, and practices to minimise the generation of Aluminium Process Scrap at all production sites of Aluminium Products. The targets to reduce both waste and Scrap generation support Circular Economy considerations. Alloys are separated to facilitate recycling at the customers' production sites, then this material is returned to Speira for recycling. Speira Recycling Services' business model is to recycle Aluminium, and is a key player on the European market for Recycled 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	The Entity has engaged in various recycling initiatives and increased its capacity to remelt and process Pre/Post-Consumer Scrap. A recycling strategy has been developed, with ambitious timelines and targets. Speira Recycling Services' business model is to recycle Aluminium and deliver recycled material to the market. The Entity engages with the European Aluminium Association (EA) and actively works in EA's Sustainability Committee; where its activities include enhancing collection and recycling of End of Life products. As a recycler, the Entity works with multiple partners to secure Aluminium Scrap as input to its production process.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>Speira Rolling accounts for its Greenhouse Gas (GHG) Emissions and energy use for all production sites. All sites report to European authorities as part of the EU Emissions Trading Scheme (ETS). The ETS reports are Third Party verified.</p> <p>However, this information is not publicly disclosed on the Entity's website.</p> <p>Speira Recycling Services accounts for and publicly discloses its Material GHG emissions and energy use by source on an annual basis, and the reports are Third Party verified. Emissions data and energy use on both a site-specific and aggregated level are publicly available at: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report/environment</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Major Non-Conformance	<p>The Entity has established a strategy for 'net zero' emissions by 2045. A variety of roadmaps, projects and energy-saving initiatives support this strategy.</p> <p>However, a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI endorsed methodology, with Intermediate Targets, has not been established.</p> <p>The Entity's German operations hold an ISO 50001 certification, and objectives, targets and action plans have been established according to requirements in this standard.</p> <p>Speira Recycling Services has established and published a 2025 GHG emissions reduction target from a 2010 baseline, and this target has not been updated to reflect recent changes to the business.</p> <p>The Entity's sustainability approach is elaborated in information available at: https://experience.speira.com/sustainability</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established Management Systems to control and limit GHG Emissions and energy use in all production Facilities. All German sites are certified according to ISO 50001 Energy Management Systems. All sites in Germany and Norway, are certified to ISO 14001 Environmental Management Systems and report annual emissions to Government bodies according to the European Emissions Trading Scheme (ETS).</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has established systems and procedures to monitor and report Emissions to Air to national authorities according to requirements in the operating permits. This information is available to the public on government bodies' web pages (i.e., https://www.norskeutslipp.no for Norway).</p> <p>Speira Rolling's air emissions inventory for 2023 is available in the Speira ASI Disclosures document: https://www.speira.com/media/ndzvk5lx/speira-asi-disclosure-document.pdf</p> <p>Speira Recycling Services has made its Emissions to Air publicly available in the Sustainability Report for 2023: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report/environment</p> <p>However, the Entity's plans to minimise exposure to, and impacts from, air emissions are not publicly available.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has established systems and procedures to monitor Discharges to Water from its production sites. Wastewater from the sites is discharged to local treatment plants or onsite treatment plants (e.g. at Speira Rolling Grevenbroich). Cooling water is released to local rivers or fjords. There are no Material Discharges to Water from any of the Entity's sites.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established plans, compliance controls and a monitoring programme to prevent and detect Spills and Leakages from its production processes. The Entity has assessed risks and implemented measures to prevent Leakages to air, water and soil. The risk assessments are part of the Entity's ISO 14001 certification.</p>

CRITERION	RATING	COMMENT
		Following the completion of risk assessments, and as part of the Environmental Management System, the Entity has developed and implemented management plans and external communication plans for any incidents involving Spills or Leakages. Emergency Response Plans for the sites are available on site-specific websites according to requirements in ISO 14001.
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity, as no incidents have been reported during the last years. Nonetheless, the Entity has implemented systems and established a reporting culture to address and disclose potentially significant Spills or Leakages.</p> <p>Speira Recycling Services has included information on significant Spills and Leakages in its Sustainability Report, available at: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report/environment</p> <p>Speira Rolling has included information on significant Spills and Leakages in the Speira ASI Disclosure Document: https://www.speira.com/media/ndzbn51x/speira-asi-disclosure-document.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a recycling and waste mitigation strategy in line with the Waste Mitigation Hierarchy. The Entity has implemented several projects and investments in waste sorting and recycling at its production sites.</p> <p>The Entity reports the quantities of Hazardous and Non-Hazardous Wastes generated at each production site to national authorities according to permit requirements. Speira Rolling data on Hazardous and Non-Hazardous Wastes for 2023 are published in the ASI Disclosure Document: https://www.speira.com/media/ndzbn51x/speira-asi-disclosure-document.pdf</p> <p>Speira Recycling Services' input material is Aluminium Scrap and waste. The majority of output waste material is salt slag from Dross processing. Wastes generated at Speira Recycling Services' sites are published in the Sustainability Report: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report/environment</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	Conformance	The Entity recovers Aluminium metal from Dross at its production sites and has invested in equipment and processes to maximise the recovery of Aluminium metal by treatment at its sites. All Dross generated by the Entity is collected and recycled. Dross is stored and managed to prevent Leakage to the environment. At Speira Recycling Services' plants in Grevenbroich and Töging, all internal Dross generated, as well as Dross from Speira's production plants is recycled. No Dross is landfilled, in line with German legislation.

7. WATER STEWARDSHIP

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors its water withdrawal and use by source and type, for all production sites, on an annual basis. The Entity's process and sanitary water intake is, for some sites, sourced from municipal water companies, while process water for other sites is supplied by nearby water bodies (i.e. the river Inn for Töging plant). Water use is metered and documented in annual consumption reports. Water use at all sites is low and considered non-Material. Speira Recycling Services has publicly disclosed its water use in the Sustainability Report, available at: https://speira.foleon.com/recycling-services/recycling-services-sustainability-report/environment
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material risks identified for water use that requires management at any of the Entity's production sites. The Entity has mapped and monitored its water use at all sites on an annual basis. There are no Material risks identified for water use at any of the Entity's production sites.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and Materiality of the impacts on Biodiversity and Ecosystem Services from its activities at all production sites. All sites are in industrial park settings. Biodiversity and environmental impacts are considered and are included in permitting processes facilitated by National or local authorities. Site-specific Biodiversity impacts are considered when conducting Major Changes or New Projects at the sites (i.e. demonstrated at the site visit at Holmestrand).
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services risk and Impact Assessments, undertaken in accordance with Speira's Environmental Management procedure, legal requirements and the ASI Performance Standard requirements, concluded that there are no Material risks or potential impacts.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services risk and Impact Assessments concluded that there are no Material risks or potential impacts. The Entity's sites are all located in industrial park settings and have implemented the Biodiversity Mitigation Hierarchy in the methodology.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services risk and Impact Assessments determined that no Priority Ecosystem Services were identified.
8.4 Alien Species	Conformance	The Entity has implemented procedures and processes on environmental and product stewardship addressing possible introduction of Alien Species with a focus on imported wood products (e.g., pallets, packaging) and ballast water from ships. Scrap and other input materials of the Entity are mostly sourced regionally (i.e. northern and central Europe). During the Entity's thermal processing of Aluminium Scrap, all species that may be present in the Scrap are destroyed.

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity does not operate in World Heritage Properties and does not explore or develop New Projects or make Major Changes in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has assessed its Area of Influence for all production sites and evaluated available government information on Protected Areas. All the Entity’s sites are located in industrial area settings and not in, or near Protected Areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has established Policies and procedures documenting respect of Human Rights. The Human Rights Policy is available on the website: https://www.speira.com/media/n4khheqb/2022-speira-human-rights-policy.pdf</p> <p>Human Rights Due Diligence assessments are performed on suppliers during in the procurement process. Speira has submitted a report to United Nations (UN) Global Compact which reveals its governance approach and commitment, with a statement of continued support of the ten principles of the UN Global Compact in the areas of Human Rights, Labour Rights, environment and anti-Corruption.</p> <p>However, documentation of the monitoring of the effectiveness of Due Diligence procedures, including the documentation in the form of minutes of meeting or decision making on supplier ‘go/no-go’ procedures, was not available during the Audit.</p>
9.2a-e Gender Equity and Women’s Empowerment	Minor Non-Conformance	<p>The Entity has implemented a Code of Conduct which includes provisions against Harassment and Discrimination in all forms and respects equality between genders. The Entity works to increase the share of women in the workforce. Plans and initiatives to promote women in the metals sector and to increase the number of women employees are established at site level, although these are not documented or publicly available and targets are not revealed.</p> <p>The Human Rights Policy Statement is publicly available: https://www.speira.com/media/k45laacl/2024_speira_gse_eng_final.pdf</p> <p>However, there is no public disclosure of the effectiveness of the measures taken to promote gender equity on an annual basis.</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 directly affected by the Entity’s operations in Germany and Norway.
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 in Germany and Norway.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations in Germany and Norway.
9.5a Cultural and Sacred Heritage - Identification	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 in Germany and Norway. There are no sacred or cultural heritage sites and values close to any of the Entity's production sites, or within the Entity's 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 directly affected by the Entity's operations in Germany and Norway. There are no sacred or cultural heritage sites and values close to any of the Entity's production sites, or within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements have been considered or taken place during the period since the Entity joined ASI and is not expected to occur during the Certification Period. Indigenous Peoples are not present in any of the areas where the Entity operates and are not directly affected by the Entity's operations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established an ongoing relationship with all Communities where it operates and supports different initiatives based on applications for local community development. Aligned with its strategy, the Entity supports local initiatives in areas such as education, sustainability, social/community development and innovation.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established Policies and procedures to avoid involvement in armed conflict or Human Rights abuses. The Entity does not operate in Conflict-Affected and High-Risk Areas (CAHRAs) according to the OECD Guidance. The Entity has established Management Systems, including a supply chain Policy, responsibilities and resources, information gathering and supplier engagement to support this.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established Policies and procedures to avoid involvement in armed conflict or Human Rights abuses. The Entity does not operate in CAHRAs according to the OECD Guidance. The Entity has established Management Systems, including a supply chain Policy, responsibilities and resources, information gathering and supplier engagement to support this.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established processes, procedures and Policies to avoid involvement in armed conflict or Human Rights abuses. The Entity does not operate in regions defined as CAHRAs according to the OECD Guidance. The Entity has implemented a strategy to identify risks and respond to identified risks.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has established Policies, processes and procedures to avoid involvement in armed conflict or Human Rights abuses. The Entity does not operate in regions defined as CAHRAs according to the OECD Guidance. The Entity's Due Diligence practices were audited as part of the ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established Policies, processes and procedures to avoid involvement in armed conflict or Human Rights abuses. The Entity does not operate in regions defined as CAHRAs according to the OECD Guidance. The monitoring of the effectiveness of Due Diligence procedures however, such as minutes of meetings, decision-making on supplier 'go/no-go' was not documented and an annual report on supply chain Due Diligence has not been established.
9.9 Security practice	Conformance	The Entity's Policies apply to all security personnel, regardless of being employed by the Entity itself or by a contracting partner company. The Entity does not employ armed security forces. The sites do not operate in Conflict-Affected or High-Risk Areas (CAHRAs).
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity recognises the principle of Freedom of Association and the right to join Labour Unions or employee organisations in line with the ILO Conventions. Freely elected Works Councils and Collective Bargaining Agreements have been implemented at all sites.
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 in Germany and Norway, the two countries in which the Entity operates, does not restrict the right to Freedom of Association, nor the right to Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity does neither use nor support Child Labour and does not engage in nor support Hazardous Child Labour. The Entity has established a Human Rights Policy stating that it does not accept Child Labour. The Entity does not employ workers under the age of 16. Apprentices under 18 years of age work under supervision of a mentor and are not allowed to do any hazardous work or work night shifts.
10.3a-c Forced Labour	Conformance	The Entity has established a Code of Conduct and Supplier Code of Conduct which restricts the use of Forced labour. The Entity is opposed to all forms of Human Trafficking and Child Labour abuse. The Supplier Code of Conduct is available at: https://www.speira.com/certifications-policies National laws, as well as Collective Bargaining and Union representation, act as continuous monitoring of working conditions on site. A Modern Slavery Statement is disclosed on the Entity's website at: https://www.speira.com/media/xt4eis5e/modern-slavery-act-statement-speira.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has established procedures and processes to ensure no Discrimination among Workers and equal opportunities are provided for all Workers, in line with ILO Conventions. As confirmed by site

CRITERION	RATING	COMMENT
		interviews and document review, the Entity does not engage in nor support any kind of Discrimination on any condition.
10.5 Communication and engagement	Conformance	The Entity has demonstrated open communication, direct involvement and engagement of Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues. The Works Council holds regular meetings with Management Representatives, Human Resources and Health and Safety.
10.6a-g Violence and Harassment	Conformance	The Entity has established Policies and procedures to ensure the rights of all Workers, and it does not tolerate Harassment or Violence. This was verified during the Audit through document review and interviews with Works Council members, Workers, management and Human Resources.
10.7a-c Remuneration	Conformance	The Entity has established and implemented procedures for Remuneration practices. Wages are prescribed according to the industry wide Collective Bargaining Agreement. Payments are made via transfer to employees' bank accounts and payslips are provided to employees, which are detailed and understandable.
10.8a-c Working Time	Conformance	The Entity has established and implemented procedures for Working Time practices. Different shift models are in place for the Entity's sites. These are approved by the Work Councils and the national authorities for different shift models. Public holidays and annual leave are paid according to national legal requirements and national standards.
10.9a-b Informing Workers of Rights	Conformance	The Entity demonstrates that Workers are informed of their rights through communications, direct involvement and engagement of Workers and their representatives. The Works Council holds regular meetings with Management Representatives, Human Resources and Health and Safety regarding working conditions and the resolution of workplace and compensation issues.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented and implemented Occupational Health and Safety (OH&S) Management System that conforms with national and international standards. All sites hold valid ISO 45001 certifications.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented OH&S Management Systems at its sites that each conform with national and international standards. All sites hold valid ISO 45001 certifications which includes integrated management reviews.</p> <p>However, there is currently no public disclosure of the effectiveness of the OH&S Management System, including lagging and leading indicators, nor comparative analyses of performance with peer businesses and leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented mechanisms to discuss Occupational Health and Safety issues with management. Safety representatives from the Entity's workforce are elected and joint Health and Safety Committees meets quarterly at all production sites.

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	13 March 2019	Issued - Certification
1	10 March 2020	Updated to reflect Certification Scope change with addition of the Holmestrand site, Norway, and provision of revised hyperlinks.
2	20 December 2021	Transfer of Certification to Speira from Hydro Aluminium Rolled Products – Provisional Certification.
3	28 October 2022	Re-Certification Audit – Full Certification
4	19 February 2025	Re-Certification Audit and Scope Change – Provisional Certification Scope Change to apply PS V3; Scope Change to add Speira Recycling Services Germany GmbH, including Speira Recycling Services Germany (Grevenbroich) (previously 'Grevenbroich'), Deizisau, Töging and Speira Recycling Services HQ as a transfer of Certificate 135 (which at the time of transfer was Provisional due to the acquisition of REAL ALLOY, and a four month extension approved to accommodate the amalgamation of audits across all sites); Scope Change to remove the supply chain activity 'Aluminium Smelting' associated with ceasing all Primary Aluminium smelting operations at the Rheinwerk/Neuss plant.
