
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**LEICHTMETALL
ALUMINIUM GIESSEREI
HANNOVER GmbH**

CERTIFICATE
NUMBER

251

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DQS CFS

DATE OF ISSUE

28 JUNE 2023

DATE OF EXPIRY

27 JUNE 2026

CERTIFIED SINCE

19 JANUARY 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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 and sales of continuous cast aluminium
wrought alloys in various formats.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Leichtmetall Aluminium Giesserei Hannover GmbH
ENTITY NAME	Leichtmetall Aluminium Giesserei Hannover GmbH
CERTIFICATION SCOPE	Production and sales of continuous cast aluminium wrought alloys in various formats.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (7 – 8 November 2022)Surveillance Audit (16 May 2023)Surveillance Audit (23 September 2024)
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none">7 – 8 November 2022 (Initial Certification Audit)16 May 2023 (Surveillance Audit)23 September 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">22 December 2022 (Initial Certification Audit)8 June 2023 (Surveillance Audit)16 November 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (7 – 8 November 2022)</u></p> <p>The audit scope includes production facilities of continuous cast aluminium wrought alloys at Leichtmetall's Aluminium Giesserei facility located in Hannover, Germany.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (16 May 2023)

The audit scope includes production facilities of continuous cast aluminium wrought alloys at Leichtmetall's Aluminium Giesserei facility located in Hannover, Germany.

The Supply Chain Activities included in the audit scope:

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

Criteria in the ASI Performance Standard relevant to the on-site component necessary to transition to Full Certification following the previous audit were included in the audit scope.

Surveillance Audit (23 September 2024)

The audit scope includes production facilities of continuous cast aluminium wrought alloys at Leichtmetall's Aluminium Giesserei facility located in Hannover, Germany.

The Supply Chain Activities included in the audit scope:

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

Criteria that were identified as non-conformities from the previous Audit and those considered higher risk were 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

28 June 2023 – 27 June 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

27 June 2026

CERTIFICATE
NUMBER

251

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established systems to maintain awareness of and ensure Compliance with Applicable Law. The process is described in a standard operating procedure and the list of Applicable Laws is up to date. The certificates are available at: https://www.leichtmetall.eu/downloads
1.2 Anti-Corruption	Conformance	The Entity prohibits all forms of Corruption, including Extortion and Bribery, which is described in Chapter 7 of the Entity's Code of Conduct. The Code of Conduct can be requested via: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct and a Company Policy that includes principles relevant to environmental, social and governance performance. The Company Policy can be requested via the contact form on the Entity's website: https://www.leichtmetall.eu/en/contact-us Code of Conduct is available at: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains documents and Policies that describe the environmental, social and governance practices, e.g., 'Unternehmenspolitik' (Company Policy).
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In the annual management review, business practices are checked for compliance with company guidelines. In addition, open questions can be discussed in the monthly meetings. The Entity has senior management endorsement and support through the provision of resources and regular review of the Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Company Policy and Code of Conduct are displayed for employees to view and presented at annual training. The Code of Conduct is available on the Entity's website: https://www.leichtmetall.eu/downloads The Company Policy can be requested via the contact form on the Entity's website: https://www.leichtmetall.eu/en/contact-us

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative. This individual has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and this is evident in the Entity's organisational chart.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an integrated and documented Environmental Management System which is certified according to ISO 14001 and ISO 45001. The Certificates are available at: https://www.leichtmetall.eu/en/about-us/our-certifications
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has an integrated and documented Environmental, Health & Safety and Social Management System which has been externally certified according to Health, Safety, Environment & Energy (HSEE). An Analysis of fields of action (Analyse_Handlungsfelder_DIN ISO 26000_Sozialmanagement) was conducted with respect to the seven core subjects and principles of ISO 26000. The main aspects and impacts identified in the risk analysis have been considered and implemented in the Management System.
2.4 Responsible Sourcing	Conformance	The Entity has established systems to maintain awareness of and ensure Compliance with Applicable Law. A Responsible Sourcing Policy is available and documented in the standard operating procedure for purchase/supplier. Together with the Code of Conduct, these address specific quality, social and environmental topics.
2.5 Impact Assessments	Conformance	The Entity has addressed the requirements for environmental, social, cultural and Human Rights Impact Assessments in the Leichtmetalls Risk Management Process (P-M2 Risikomanagement). For New Projects, a checklist for new installations (F-U1-5 Checklist neue Anlagen) is used and considers sustainability aspects. The details are then documented in the risk register.
2.6 Emergency Response Plan	Conformance	The Entity has site-specific emergency response plans developed and implemented.
2.7 Mergers and Acquisitions	Conformance	The Entity was acquired by Emirates Global Aluminium (EGA) in 2024, which is ASI Certified. https://media.ega.ae/ega-completes-acquisition-of-leichtmetall-european-speciality-foundry-in-high-strength-recycled-aluminium The Entity is located in a highly regulated country

CRITERION	RATING	COMMENT
		(Germany), where relevant projects and changes must undergo a thorough analysis and authorisation process, and has systems in place to manage any potential mergers and acquisitions effectively.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity is located in a highly regulated country (Germany), where relevant projects and changes must undergo a thorough analysis and authorisation process, and has systems in place to manage any potential closure, decommissioning and divestment effectively
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the 2023 Sustainability Report, available at:</p> <p>https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf</p> <p>The Report was prepared according to the German Sustainability Code (Deutscher Nachhaltigkeitskodex): https://www.deutscher-nachhaltigkeitskodex.de/en-gb</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has not received significant fines, judgments, penalties, or non-monetary sanctions for failure to comply with Applicable Law since it joined ASI. The Entity discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting. Details on any non-compliances or liabilities are reported in the German Company Register, available at:</p> <p>https://www.unternehmensregister.de/ureg/result.html?jsessionId=61CB5325184FA90468C02C4BDBD05C42.web04-1</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis, and are checked via an annual audit of the balance sheets by auditors. No issues were reported in the previous report. Accounting / Financial reports are available in the German Company Register, available at:</p> <p>https://www.unternehmensregister.de/ureg/result.html?jsessionId=61CB5325184FA90468C02C4BDBD05C42.web04-1</p>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has implemented accessible, transparent, understandable, and culturally and gender sensitive Complaints Resolution Mechanisms, which are adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. Complaints can be reported directly on the Entity's homepage via https://www.leichtmetall.eu/en/contact-us https://leichtmetall.whistleport.de</p> <p>The Entity has implemented a process to manage these complaints.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a Life Cycle Assessment (LCA) based on ISO 14040/44 covering the Facility as well as the five main alloy types used. The LCA considers GHG emissions (Scopes 1, 2, and 3) from the purchasing of raw materials (without delivery/transport routes) to the delivery at the customer's factory gate.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	To date no customer request has been made, however, the Entity would be available to send the requested information to the customer.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Information relating to the CO₂ footprint of the Entity is available in the Sustainability Report 2023, chapter 3.1:</p> <p>https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf</p> <p>The public communication of the CO₂ footprint is provided with underlying assumptions including system boundaries.</p>
4.2 Product design	Not Applicable	The Criterion is not applicable to the Entity, as it is not involved in the design and development process of products or components. It sews, turns and produces a 100% ultrasonic testing of the billet based on customer requests or testing standards (i.e. AMS STD 2154) to provide the highest quality required.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and, where generated, targets 100% of scrap for collection, recycling and/or re-use. 100% of the scrap is being remelted on-site.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, including activities and targets. Customers are offered to buy back any scrap that arises (buyback). Implementation is continuously checked with KPIs (e.g., scrap rate)
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity does not manufacture any end products containing Aluminium. The Entity is a member of Aluminium Deutschland and Wirtschaftsgemeinschaft Metall (WGM) and therefore supports recycling efforts indirectly.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published its energy use information and CO ₂ e emissions per metric tonne of produced Aluminium based on Scopes 1 and 2 and 3 in the Sustainability Report 2023, chapter 3.1: https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has published its GHG emissions reduction target, to be Greenhouse Gas emissions neutral in Scopes 1 and 2 by 2045. The Entity has implemented a plan to achieve this target which is disclosed in the Sustainability Report 2023, chapter 2.1: https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf However, it was identified that the reduction target is not sufficiently substantiated with measures, and does not include reduction measures for Scope 3 emissions.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity reports Emissions to Air that have the potential to cause adverse effects on humans or the environment in an annual internal report. The Entity has established sound systems and procedures to track Emissions to Air to national authorities and has established monitoring processes. The Entity has demonstrated all conditions were under permit thresholds. Emissions data are available in the Sustainability Report 2023, chapter 3.1.3: https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf
6.2 Discharges to Water	Conformance	The Entity does not directly discharge wastewater into rivers, creeks, or lakes, but indirectly into a publicly owned wastewater treatment plant. There are no protected areas or surface waters in the vicinity of the industrial and commercial park. No incidents involving substances hazardous to water have occurred in recent years, and no substances hazardous to water have entered the sewerage system or groundwater.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Within the scope of its certified Environmental Management System, the Entity periodically assesses the major risk areas related to spills and leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Following the completion of risk assessments, and as part of their Environmental Management System, the Entity has developed and implemented compliance controls and a monitoring programme to prevent and detect Spills or Leakage. No incidents involving substances hazardous to water occurred in recent years.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity discloses to affected parties the volume, type, and potential impact of significant Spills immediately after an incident. No incidents have occurred for at least the last two years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity discloses to affected parties the volume, type, and potential impact of significant Spills immediately after an incident. No incidents have occurred for at least the previous two years.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. Waste data is provided in the Sustainability Report 2023, chapter 3.1.1:

CRITERION	RATING	COMMENT
		https://www.leichtmetall.eu/media/nw0mr050/leichtmetall-aluminium-giesserei_nachhaltigkeitsbericht_2023.pdf
6.5b Waste management and reporting (disclosure)	Conformance	A waste management officer has been appointed to manage waste management at the Entity. This appointee arranges the collection separately according to types of waste and disposal or recycling in accordance with the legal regulations. Depending on what is required, the requirements for the disposal certificate and the corresponding consignment note procedure according to regulations either KrWG (Act to Promote the Circular Economy and Ensure the Environmentally Sound Management of Waste) or NachwV (Ordinance on Waste Disposal Records) are fulfilled and reported to local authorities. The waste management officer prepares an annual waste balance sheet and evaluates the volume of waste in relation to production.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity works continually to maximise the recovery of Aluminium by treatment of Dross and Dross residues. 100% of the Dross is being collected and shipped for recovery of the Aluminium content.
6.8b Dross (recycling)	Conformance	The Entity sends all recovered Dross to two recycling facilities. Residues from the Dross recycling (Salt slag) are also recycled. Recovered Aluminium is fed back into the process of the Entity. 100% of the Dross is recycled.
6.8c Dross (review of alternatives)	Conformance	100% of the Dross is collected and recycled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. Wastewater generated is predominantly blowdown water from the cooling circuits, surface water and sanitary wastewater.
7.1b Water assessment (risk assessment)	Conformance	An up-to-date risk assessment of impacts arising from water use was prepared as part of the general environmental risk assessment. Preventive measures have been implemented accordingly. There are no Watersheds in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	No detailed water management plans beyond the standard ones are necessary, because no significant risks have been identified.
7.2b Water management (monitoring)	Conformance	No detailed monitoring is necessary as no significant issues have been identified.
7.3 Disclosure of water usage and risks	Conformance	Water related risk and consumption are not considered significant at the Entity. However, data may be requested via https://www.leichtmetall.eu/en/contact-us
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has evaluated that its location is not in or close to a naturally sensitive area, as it is situated within an industrial park. Therefore, no additional environmental impact assessment requirements. The Entity has decided to support a local

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		Biodiversity project, and analysis of other projects is ongoing.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, there were no Material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, there were no material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
8.2c Biodiversity management (reporting)	Conformance	There were no material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures and therefore no information has been published
8.3 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. For example, attention is paid to compliance with the IPPC standard ISPM 15.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights. A Policy commitment to respect Human Rights can be found in the Entity’s Code of Conduct. The Code of Conduct is available at:

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		https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf The Company Policy can be requested via the contact form on the Entity's website: https://www.leichtmetall.eu/en/contact-us
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity's Human Rights Due Diligence process has not yet been completed and documented. The process is described in detail according to the specific requirements. Dealers have been listed, but Tier 1 suppliers are not explicitly listed if the material is purchased via dealers.
9.1c Human Rights Due Diligence (remediation)	Conformance	As confirmed by Workers and management and according to the Human Rights Due Diligence check, the Entity has no salient adverse Human Rights impacts present. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, remediation activity is not required.
9.2 Women's Rights	Conformance	As stated in the Code of Conduct, the Entity does not tolerate any Discrimination, including against women. Interviews with employees and Worker representatives confirmed that there has never been a case of Discrimination against women.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there are no cultural and sacred heritage features present within or adjacent to the Entity's Certification Scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as no resettlements have been caused directly or indirectly by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as no resettlements have been caused directly or indirectly by the Entity.
9.7a Local Communities (rights and interests)	Not Applicable	This Criterion is not applicable because the outcome of the Human Rights Due Diligence conducted has not identified the presence of issues

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		affecting Local Communities, and the Entity is located within an industrial park.
9.7b Local Communities (impacts)	Not Applicable	This Criterion is not applicable because the outcome of the Human Rights Due Diligence conducted has not identified the presence of issues affecting Local Communities, and the Entity is located within an industrial park.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable because the outcome of the Human Rights Due Diligence conducted has not identified the presence of issues affecting Local Communities, and the Entity is located within an industrial park.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity commits that it shall not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. In the contract with the suppliers is defined that the supplier confirms that the Conflict Commodities Regulation (EU) 2017/821 and the Dodd-Frank Act are to be complied with.
9.9 Security practice	Conformance	The Entity does not engage a security service. The external service provider of the industrial park is contracted from the park itself. Human Rights in line with recognised standards and good practices are respected.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a well-established and freely elected works committee according to German law. Sufficient resources are provided, and Workers are free to join any local union organisations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to engage freely with Trade Unions, seek representation and join the works council without interference. Collective Bargaining Agreements exist on a national level, negotiated with the industry wide union IGM.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable, the Entity operates in Germany where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining. The industry wide collective agreement of the foundry industry is applied. The Entity has an open position on employee representation.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in Germany. The Entity neither uses nor supports the use of Child Labour

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		as defined in ILO Conventions C138 and C182 and shall comply with related national and international law. Only employees equal to or older than 18 years are hired.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in Germany. The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182 and shall comply with related national and international law. Only employees equal to or older than 15 years are hired.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182 and shall comply with related national and international law. Only employees equal to and older than 18 years are hired.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. This commitment is published in the Code of Conduct: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies. This commitment is published in the Code of Conduct: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. There are no Migrant Workers contracted and even if, then no deposits or security payments at any time would be lodged.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. It does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. It never restricts the freedom of movement of Workers in the workplace or in on-site housing, which is not present on-site.

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10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity never retains original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and never denies Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or 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. Interviews confirmed that there is no Discrimination evident.
10.5 Communication and engagement	Conformance	Open communication was evident during the Audit, facilitated by the small company size. A WhatsApp Group Leichtmetall channel assists in facilitating communication throughout the site.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments in a timely manner, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity complies with Applicable Law on Working Time (including Overtime working hours), public holidays and paid annual leave. Working hours are recorded.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented and communicated an Occupational Health and Safety (OH&S) Policy. It is frequently reviewed in the annual Management

CRITERION	RATING	COMMENT
		Review. Senior management has endorsed and supported through the provision of resources. Additionally, the Entity is certified according to ISO 45001. The OH&S Policy is available and can be requested via: https://www.leichtmetall.eu/downloads
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has applied its OH&S Policy to all Workers and Visitors present in any area or activities under the Entity's control. The Policy is part of employee training and Supplier Chain of Custody requirements.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OH&S Policy commits to comply with Applicable Law on Workers' health and safety, and international standards. The OH&S Policy is available to Stakeholders and can be requested via: https://www.leichtmetall.eu/downloads
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The OH&S Policy includes a commitment that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. Therefore, employees participate in regular risk assessments.
11.2 OH&S Management System	Conformance	The Entity has a documented OH&S Management System that is conformant with applicable national and international standards and certified according to ISO 45001: https://www.leichtmetall.eu/en/about-us/our-certifications
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism, such as a joint health and safety committee, by which they can raise, discuss, and participate in the resolution of OH&S issues with management. There are several Worker representatives elected.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance using indicators and strives to continuously improve performance against these indicators in conjunction with establishing targets.

Document Control and Version History

Revision	Date	Notes
0	19 January 2023	Initial Certification Audit – Provisional Certification
1	30 June 2023	Surveillance Audit – Full Certification
2	5 December 2024	Surveillance Audit