

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Triangle's - Cycling Equipments, S.A.

CERTIFICATE NUMBER  
**384**

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

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

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

DATE OF ISSUE  
**6 AUGUST 2024**

DATE OF EXPIRY  
**5 AUGUST 2027**

CERTIFIED SINCE  
**6 AUGUST 2024**

## AUTHORISED BY

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

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*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.Aluminium-stewardship.org](http://www.Aluminium-stewardship.org)*

## CERTIFICATION SCOPE

The Agueda plant of Triangle's -  
Cycling Equipments, S.A., located in  
Borralha, Portugal and includes its  
seven warehouses.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Triangle's - Cycling Equipments, S.A.
ENTITY NAME	Triangle's - Cycling Equipments, S.A.
CERTIFICATION SCOPE	The scope is limited to the Agueda plant of Triangle's - Cycling Equipments, S.A., located in Borralha, Portugal and includes its seven warehouses.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>9 - 12 April 2024</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>28 June 2024</li></ul>
AUDIT SCOPE	<p>The Audit Scope covers the Agueda plant of Triangle's - Cycling Equipments, S.A., located in Borralha, Portugal and includes its seven warehouses.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><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.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	6 August 2024 - 5 August 2027
NEXT AUDIT TYPE	Surveillance Audit

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NEXT AUDIT DATE 5 February 2026

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CERTIFICATE NUMBER 384

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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.

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## ENTITY OVERVIEW

Triangle's (the "Entity") produces Aluminium frames for electric bicycles, combining different types of Aluminium parts, including tubes, forgings and castings. Each component undergoes several processes before being incorporated by welding into a final frame. The main processes at the Entity are welding, cutting, heat treatment, 3D laser cutting, ink machining, polishing, finishing processes, painting, hydroforming, bending, and strength testing. These frames can be ground, painted (liquid or electrostatic paint) or sold as they are. The Entity has seven main areas: Area 1: tube preparation (machining, brazing, washing, bending); Area 2: welding; Area 3: Finishing processes such as heat treatment, grinding, and polishing; Area 4: painting; Area 5: laser cutting and hydroforming, Areas 6 and 7: storage and future tube preparation.

The Agueda plant of the Entity is located in Parque Empresarial do Casarão Avenida das 2 Rodas N.1146 3750-860 Borralha, including its seven warehouses, and contains approximately 29,000 square meters of covered area. The Entity is constantly investing in new areas and industrial capacity to meet the needs and expectations of its clients and other stakeholders, leveraging top-tier technologies, where different industrial processes (welding, CNC, thermal treatment, polishing, painting, among others) are used. The Entity aims to produce one million frames by 2030 by expanding its manufacturing facilities whilst maintaining the use of leading practice technology and processes.

## 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
<b>SYSTEMS</b>	High	High	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has developed a Code of Conduct and implemented procedures to identify risks and comply with applicable legislation. These procedures allow communication to all persons, ensuring legal compliance. These systems identify and record legal requirements from specialised external sources and are supported by specialised legal firms. The Entity's Compliance Board leads this process, which is audited and reviewed annually by external consultants and auditors.
1.2 Anti-Corruption	Conformance	<p>The Entity has developed and communicated its Code of Conduct, including the Supplier Code of Conduct. The Entity has also implemented an Ethics and Whistleblowing Policy to manage legal non-compliance and a procedure to identify, monitor and investigate complaints or legal breaches. The Policy is available at <a href="https://triangles.eu/wp-content/uploads/2024/05/Politica-de-etica-e-protecao-e-denuncia_1.pdf">https://triangles.eu/wp-content/uploads/2024/05/Politica-de-etica-e-protecao-e-denuncia_1.pdf</a>.</p> <p>The Entity has conducted and maintained an updated risk analysis of Anti-Corruption and criminal offences, which has resulted in an action plan for their control. The Entity has also provided its personnel with Anti-Corruption and anti-fraud values and policies training.</p>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, which is communicated to employees and reviewed annually. The Code is available at <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> . It is complemented by a Supplier Code of Conduct, available at <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> .
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity is ISO 9001, ISO 14001 and ISO 45001 Certified. These systems are aligned with the ASI Performance Standard requirements. The related policies are approved and led by the Entity's Chief Executive Officer (CEO) and the Executive Committee, including resourcing their deployment. The policies are available at: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>
2.2a-c Leadership	Conformance	The Entity has appointed its People and Sustainability Director as the senior management representative for deploying and implementing the ASI Performance Standard. The Director has the responsibility and authority to ensure compliance with the Standard's requirements and the provision of resources for implementing the defined policies.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity is ISO 14001 Certified, and its Environmental Management System is aligned with its stakeholders' needs and expectations, including the ASI Performance Standard.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has an ISO 45001 Health and Safety Management System aligned with the needs and expectations of its stakeholders (external and internal). A Social Management System component has also been developed and integrated. There is evidence of role assignment, risk analysis and action plans to eliminate or reduce risks and take advantage of opportunities. There is evidence of community support for cycling-related sporting events and employment generation for women and disadvantaged groups. The Entity has also established a

CRITERION	RATING	COMMENT
		committee to oversee the effectiveness of the social, health and safety management systems.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has established and communicated its Supplier Code of Conduct, which is published on the website at: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> . The Entity has implemented a supplier evaluation process aligned with the ASI principles. However, at the time of the Audit, this evaluation process has yet to be fully implemented.
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has no major short-term changes planned. The Entity has defined a process for Due Diligence, based on the Kaizen methodology, prior to changes or projects, assessing governance, environmental, and social risks, and it is conducted annually. The results of the evaluation processes and the opportunities for improvements are published at <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> .
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has no major short-term changes planned. The Entity has defined a process for Human Rights Due Diligence, based on the Kaizen methodology, prior to changes or projects, assessing governance, environmental, and social risks, and it is conducted annually. The results of the evaluation processes and the opportunities for improvements are published at <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> .
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented a certified Management System that includes emergency response plans, which are developed with acknowledgement of identified risks. Workers are trained in emergency response, and the Entity conducts emergency drills as required by local health and safety law.
2.8a-d Suspended Operations	Conformance	The Entity has established a risk assessment in case of operation suspension. It has not suspended operations in the past and does not plan to do so in the coming years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a risk assessment for mergers and acquisitions. The Entity has not been engaged in any merger or acquisition activities in the past and does not plan to do so in the coming years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a risk assessment process for closure or dismantling and does not plan to close or dismantle any plant or facility.
<b>3. Transparency</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed a Sustainability Plan defining its sustainability strategy, objectives, and action plans. The Entity also produces a Sustainability Report annually, which includes a materiality analysis to assess governance, environmental, and social impacts. It is published on the website at: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a> .
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgements, penalties, and non-monetary sanctions for non-compliance with Applicable Legislation. The Entity has established a

CRITERION	RATING	COMMENT
		procedure to verify and address non-compliance regularly as per its Integrated Management System.
3.3a-c Payments to Governments	Conformance	The Entity's Code of Conduct states that no donations or political contributions are made in its name. The Entity has defined a legal compliance plan, which includes a risk analysis to identify and assess the risks of legal non-compliance regarding corruption and payments to governments or political parties.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established an Ethics and Whistleblower Protection Policy alongside internal rules and procedures that constitute the system for receiving, processing and addressing complaints and grievances. This Policy has been published on the website: <a href="https://triangles.eu/wp-content/uploads/2024/05/Regulamento-de-Comunicacao-de-Irregularidades_VI.pdf">https://triangles.eu/wp-content/uploads/2024/05/Regulamento-de-Comunicacao-de-Irregularidades_VI.pdf</a> . The Complaints Mechanism is accessible via <a href="mailto:etica@triangles.pt">etica@triangles.pt</a> . The process is transparent and appropriate for the social context of the populations and organisations that may be affected. No complaints have yet been registered by interested parties.
<b>4. Material Stewardship</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity annually assesses the environmental impacts associated with its product life cycle. This assessment integrates the product Life Cycle Assessment (LCA), from the manufacture of the Aluminium and its transport, the manufacturing activities carried out by the Entity, transport to customers, assembly and use of the product by customers, as well as the End of Life of the product and the transport and disposal of waste. The Entity demonstrates improvement actions to reduce the impacts identified.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has not yet received any customer requests to access and review its products' Life Cycle Assessment (LCA).
4.2 Product Design	Conformance	The Entity demonstrates that considerations relating to the circular economy are incorporated in the product design process, including the return of End-of-Life products in the manufacturing process. For example, Recycled Aluminium and other materials are used, and packaging is to be reduced 10% by 2024.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has defined a strategy to reduce Aluminium waste and works with Aluminium manufacturers to promote recovery and recycling. The Entity's Aluminium alloys are separated for recycling purposes.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has defined an Aluminium waste reduction strategy with a target of Aluminium waste per bicycle frame sold. The Entity's recycling strategy is in its Sustainability Plan, available at: <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability-Plan-2024-2025_EN-3.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability-Plan-2024-2025_EN-3.pdf</a>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has defined a strategy to reduce Aluminium waste, with a target of Aluminium waste per bicycle frame sold. The Entity's recycling strategy is in its Sustainability Plan, available at: <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability-Plan-2024-2025_EN-3.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability-Plan-2024-2025_EN-3.pdf</a>.</p> <p>In addition, the Entity is a member of Shift Cycling Culture. This global not-for-profit initiative draws on the support and commitment of the cycling industry and the wider community. They promote the transition to a more sustainable future for cycling.</p>
5. Greenhouse Gas Emissions		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has implemented an ISO 14001 Certified Environmental Management System that annually assesses energy consumption and GHG emissions. Energy consumption and GHG emissions for scopes 1, 2 and 3, have been calculated and verified annually by an independent Entity based on the GHG protocol. The consumption and GHG emissions data for each source are published each year in the Sustainability Report at: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>.</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.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has defined a GHG emissions reduction strategy based on the reduction of CO2 emissions with the following targets: a 2.5% reduction of emissions by 2024, a 5% reduction of emissions by 2026, a 7.5% reduction of emissions by 2028 and a 10% reduction of emissions by 2030. This strategy is defined in the Sustainability Plan 2024-2025, reviewed annually and published on the website: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>. It covers all emission sources and considers technological developments in the sector. The progress and effectiveness of this strategy are reviewed annually, and the results are included in the Sustainability Report published on the same website: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>. The Entity defines actions to reduce GHG emissions, including increasing the number of photovoltaic panels, automating and maintaining lighting systems, acquiring a fleet of hybrid cars and reducing combustion cars.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an ISO 14001 Certified Environmental Management System that monitors energy consumption and GHG emissions monthly. Operational control monitoring and measurement procedures have been defined to control consumption and emissions, achieve reduction targets, and measure the effectiveness of actions.</p>



CRITERION	RATING	COMMENT
6. Emissions, Effluents and Waste		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity has implemented a QHSE Management System in accordance with the ISO 14001 standard that identifies and monitors the sources of atmospheric emissions. Operational control monitoring and measurement procedures have been defined. The Entity has implemented actions to reduce pollutant load in atmospheric emissions and annually reviews the performance and effectiveness of its plan. However, the Entity has not published data on the action plans or the results of its emission reduction initiatives.
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity has implemented a QHSE Management System in accordance with ISO 14001, identifying and controlling discharges to water. The Entity annually reviews the performance and effectiveness of the water discharge reduction plan. However, the Entity has not published data on action plans or results achieved in reducing discharges to water.
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	The Entity has implemented a QHSE Management System in accordance with ISO 14001-ISO 45001 standards. The Entity has developed a matrix of emergency situations that evaluates risk areas for spillages and leaks that could contaminate the air, water and/or soil. To date, there have been no emergency situations involving spills or leaks. To ensure operational control, emergency spill drills are carried out, planned according to the three year drill plan. However, the Entity has not published data on spill or leakage management action plans.
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	The Entity has implemented a QHSE Management System in accordance with ISO 14001-ISO 45001 standards. It has also developed a communication process to inform interested parties, such as neighbouring populations or organisations, of incidents involving spills or leaks. To date, no emergency situations related to spills or leaks have occurred. However, the Entity has not published data on impact assessments of spills or leaks and their causes and actions.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a QHSE Management System in accordance with ISO 14001. The Entity manages all waste, hazardous and non-hazardous, with authorised waste managers and reports withdrawals on the environmental authority's platform, where waste generation data is monitored, and reduction targets are set. A target of 10% reduction of waste generation by 2030 has been defined. The strategy, objectives and actions to reduce waste are communicated annually in the Sustainability Plan, and generation data is communicated, separated by the recovered and non-recovered waste in the Sustainability Report: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>
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		

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	Water sources have been identified, and consumption is being monitored. The Entity has also assessed water risks, and no high risks have been identified. Water consumption data are published in the Sustainability Report: <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf</a> . However, the report does not differentiate between mains water and well water. The results of the water risk analysis have also not been published.
7.2a-e Water Management	Conformance	The Entity has defined a water consumption reduction plan with a target of water consumed per unit sold. The annual management review evaluates the effectiveness of the water consumption reduction plan and whether the target has been achieved. Water consumption data and the reduction plan are published in the Sustainability Report: <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf</a> .
<b>8. Biodiversity and Ecosystem Services</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located within an industrial park, and at the time of the construction, a Biodiversity and Ecosystem Risk and Impact Assessment was conducted within the Area of Influence. The assessment determined that biodiversity-related risks are low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Entity's Biodiversity-related risks are rated as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the Entity's Biodiversity-related risks are rated as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the Entity's Biodiversity-related risks are rated as low.
8.4 Alien Species	Conformance	The Entity has consulted and complied with the local authority to ensure that exotic species do not affect local biodiversity. The Entity conducts inspection activities throughout the plant to determine whether exotic species are confirmed on-site or if there is indirect evidence of their presence.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is located within an industrial park, and no World Heritage properties exist in the area of influence. The Entity has developed a procedure for New Projects or Major Changes that includes assessing the locations of World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity is located within an industrial park, and no Protected Areas exist in the Area of Influence. The Entity has developed a procedure for New Projects or Major Changes that includes assessing the locations of Protected Areas. As the impact is deemed low, the Entity communicates with the local community authority and business.

CRITERION	RATING	COMMENT
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.
<b>9. Human Rights</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has defined a Human Rights Policy in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, specifically the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO), the eight fundamental conventions of the ILO and the International Bill of Human Rights. The Policy includes a gender perspective, and it is reviewed at least every five years <a href="https://triangles.eu/wp-content/uploads/2024/05/Human-Rights-Due-Diligence-Process_EN_V1-2-1.pdf">https://triangles.eu/wp-content/uploads/2024/05/Human-Rights-Due-Diligence-Process_EN_V1-2-1.pdf</a></p> <p>The Entity has defined a Human Rights Due Diligence process, which includes analysis of the affected populations and organisations in the area of influence. However, at the time of the Audit, the Due Diligence process was continuing and had not yet been finalised. The Audit demonstrates no Human Rights impact on populations and organisations in the Entity's Area of Influence.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented a program to promote gender equality and women empowerment, providing training and employment. The Entity has a programme to develop and promote professional management profiles occupied and led by women. A harassment protocol and a complaints channel have been deployed to deal with complaints of discrimination, violence or harassment. The effectiveness of the equality plan is disseminated annually through data provided in the Sustainability Report, such as data on employment, contracts and training of women and men, as well as data on leadership positions occupied by women. The Sustainability Report <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf_compressed-1.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no traditional populations within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity as there are no traditional populations within the Entity's Area of Influence.
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 there are no traditional populations within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as there are no cultural or sacred heritage properties 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 there are no cultural or sacred heritage properties within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it does not have plans for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has defined a Human Rights Due Diligence process, which includes analysis of the affected populations and organisations in the Area of Influence. The audit shows no Human Rights impact on populations and organisations in the Entity's area of influence.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source Bauxite, Alumina or Primary Aluminium.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source Bauxite, Alumina or Primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source Bauxite, Alumina or Primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source Bauxite, Alumina or primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source Bauxite, Alumina or Primary Aluminium.
9.9 Security practice	Conformance	The Entity has outsourced security services to a subcontractor company. This company provides access control services with security guards. The guards are not armed. The Entity has informed this subcontractor of its Code of Conduct for suppliers with a commitment to respect Human Rights. The Entity monitors the security service through meetings with the subcontractor. There are no reports of abuse of power or of respect for Human Rights.
<b>10. Labour Rights</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity only operates in Portugal, a country that does not restrict the right to Freedom of Association and Collective Bargaining. The Entity has approved a collective agreement with the Workers' representatives as defined in the Entity's Human Rights and Working Conditions Policy.
10.1d Freedom of Association and Right to Collective Bargaining –	Not Applicable	This Criterion is not applicable to the Entity as it only operates in Portugal, a country that does not restrict the right to Freedom of Association and Collective Bargaining.

CRITERION	RATING	COMMENT
Alternative means in context of Applicable Law		
10.2a Child Labour	Conformance	<p>The Entity has established a Human Rights and Working Conditions Policy that does not allow Child Labour and protects youth employment. The Entity fosters a close collaboration relationship with different educational institutions, promoting curricular and professional internships, guaranteeing all their rights, and granting them a remuneration that encourages learning and collaboration, as long as the legislation allows. The Entity guarantees that Workers under 18 do not undertake any activity that poses a greater risk to their Health and Safety, such as shift work or strenuous work.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a Human Rights and Working Conditions Policy that does not allow Forced Labour or Modern Slavery.</p> <p>The Entity also defines an annual Modern Slavery Statement detailing actions to combat slavery. The Human Rights and Working Conditions Policy and the Modern Slavery statement are published at: <a href="https://triangles.eu/wp-content/uploads/2024/05/Politica-direitos-humanos-e-condicoes-de-trabalho-3.pdf">https://triangles.eu/wp-content/uploads/2024/05/Politica-direitos-humanos-e-condicoes-de-trabalho-3.pdf</a></p> <p>The Entity's Modern Slavery Statement is extended to its supply chain through its Supplier Code of Conduct. The Entity does not engage in or support human trafficking directly or through any employment or recruitment agency. The Entity has defined a recruitment process in accordance with legislation, its Human Rights Policy, and its Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established a Human Rights and Working Conditions Policy that does not allow Discrimination or Harassment in any form. The Policy is published at: <a href="https://triangles.eu/wp-content/uploads/2024/05/Politica-direitos-humanos-e-condicoes-de-trabalho-3.pdf">https://triangles.eu/wp-content/uploads/2024/05/Politica-direitos-humanos-e-condicoes-de-trabalho-3.pdf</a>.</p> <p>The Entity's Policy statements are extended to its supply chain through its Supplier Code of Conduct. The Entity has defined a recruitment process that does not allow discrimination, developed a gender pay gap analysis, developed non-discriminatory promotion criteria in its Human Resources process, and is developing a performance evaluation process to promote equal opportunity.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has an open communication process between Workers, their representatives, and the Entity. Meetings and formal engagements with the agreements reached and published on information boards. Several complementary communication dynamics have been deployed, such as daily meetings and information panels. These dynamics are highly valued by employees.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a Code of Conduct and a Human Rights and Working Conditions Policy against violence, harassment, or discrimination, published at: <a href="https://triangles.eu/repository/">https://triangles.eu/repository/</a>. The Entity has developed an equality plan in compliance with legislation, which is reviewed every five years. As a result of this plan, a harassment protocol has been deployed and implemented. A Complaints Channel is outsourced through an independent Entity and to date, no complaints have been received in this respect. Workers have been training on the Code of Conduct, the Human Rights and Working</p>

CRITERION	RATING	COMMENT
		Conditions Policy, the Equality Plan, the Harassment protocols, and the complaints channel.
10.7a-d Remuneration	Conformance	The Entity has approved a collective agreement with the employees' representatives that includes the conditions of financial remuneration in accordance with the legislation. The Entity has software for collecting working hours and payroll processing. Payment to Workers and delivery of the payroll are made in accordance with both legislative requirements and the collective agreement.
10.8a-c Working Time	Conformance	The Entity has approved a collective agreement with employee representatives that includes working hours, working days, holidays, paid holidays, and rest periods in accordance with legislation. The Entity uses software to record working hours and payroll processing. The Entity demonstrates that employees have at least one day off for every seven day period and guarantees that the working day does not exceed eight hours on average over six months. Paid holiday periods are evidenced in accordance with the collective agreement and relevant legislation.
10.9a-b Informing Workers of Rights	Conformance	The Entity has approved a collective agreement with the Workers' representatives, including the Workers' rights. This collective agreement is published in the information areas and communicated in the employment contract. The Entity provides spaces and resources for workers' representatives to inform workers of their rights. The Entity has implemented an ISO45001 QHSE system that deploys a participatory consultation process to inform workers, inter alia, through a Works Council where questions regarding the collective agreement, including Workers' rights, are addressed.
<b>11. Occupational Health and Safety</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an ISO Certified QHSE Management System. This System includes participation and consultation with workers and has been defined to address Health and Safety aspects. A preventive planning process detailing a Health and Safety action plan has been established. The Entity provides resources and support for controlling and improving its Health and Safety management system. Processes to investigate, analyse and avoid incidents recurrence are in place. Operational control of health and safety is evidenced by employee training, coordination of activities with subcontractors, safety inspections at the plant, machine and equipment reviews, and delivery and provision of safety equipment.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented an ISO Certified QHSE Management System. A Health and Safety Management Procedure has been established based on indicators, and the effectiveness of the health and safety action plan is monitored based on lagging and leading indicators and targets. The effectiveness of the Health and Safety system is reviewed during the annual Management Review. Health and Safety results, targets, and actions are included in the annual Sustainability Report: <a href="https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf">https://triangles.eu/wp-content/uploads/2024/05/Triangles_Sustainability_Report_2022.pdf</a> <a href="#">compressed-1.pdf</a>.</p> <p>The "Mission Safety" report also publishes leading and lagging indicators and health and safety benchmarking:</p>

CRITERION	RATING	COMMENT
		<a href="https://triangles.eu/wp-content/uploads/2024/06/MISSAO-SAFETY-ON.pdf">https://triangles.eu/wp-content/uploads/2024/06/MISSAO-SAFETY-ON.pdf</a> .
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an ISO Certified QHSE Management System. Workers can raise and discuss Health and Safety and work-related issues with management and participate in their resolution through the Health and Safety Committee meetings. Workers have received training on how to raise issues with the Safety Committee, and these communications have been registered.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	6 August 2024	Certification Audit - Full Certification
1	4 March 2025	Correction to the Comment for Criterion 8.1-8.3, 9.3, 9.4a, 9.4c, 9.5-9.6 and 10.1d to reflect the reason for non-applicability.