ASI CERTIFICATION PERFORMANCE STANDARD



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PRESENTED TO

Capral Aluminium

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION	ASI ACCREDITED
287	PERFORMANCE	LEVEL	AUDITING FIRM
	STANDARD (V3 2022)	FULL CERTIFICATION	SUSTAINABLE CERTIFICATION F LTD
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	2 JUNE 2023	1 JUNE 2026	2 JUNE 2023

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

The extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations including Angaston, Archerfield, Bremer Park, Bremer Park RDC, Burleigh Heads, Cairns, Campbellfield, Campbellfield RDC, Canning Vale, Canning Vale RDC, Capral Penrith, Cardiff, Deception Bay, Glenorchy, Huntingwood, Kilburn, Kunda Park, Laverton, Lynbrook, Noble Park, Rockdale, Smithfield, Springwood, Townsville, Wangara, Welshpool, Winnellie, and Wollongong.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Capral Aluminium		
ENTITY NAME	Capral Aluminium		
CERTIFICATION SCOPE	The extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations including Angaston, Archerfield, Bremer Park, Bremer Park RDC, Burleigh Heads, Cairns, Campbellfield, Campbellfield RDC, Canning Vale, Canning Vale RDC, Capral Penrith, Cardiff, Deception Bay, Glenorchy, Huntingwood, Kilburn, Kunda Park, Laverton, Lynbrook, Noble Park, Rockdale, Smithfield, Springwood, Townsville, Wangara, Welshpool, Winnellie, and Wollongong.		
SUPPLY CHAIN ACTIVITIES	Semi-FabricationMaterial Conversion		
ASI STANDARD	Performance Standard V3		
AUDIT TYPE	 Initial Certification Audit (6 – 17 March 2023) Surveillance Audit and Scope Change (30 October – 20 November 2024) 		
AUDIT FIRM	Sustainable Certification Pty Ltd		
AUDIT DATE	 6 - 17 March 2023 (Initial Certification Audit) 30 October - 20 November 2024 (Surveillance Audit and Scope Change) 		
AUDIT REPORT SUBMISSION	 11 May 2023 (Initial Certification Audit) 20 December 2024 (Surveillance Audit and Scope Change) 		
AUDIT SCOPE	Initial Certification Audit (6 – 17 March 2023) The Audit Scope covers the extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations at Bremer Park, Bremer Park RDC, Campbellfield, Campbellfield RDC, Huntingwood, Laverton, Rockdale, Smithfield, and Springwood.		
	The Entity uses the ASI multi-site sampling approach and sites Angaston, Burleigh Heads, Cairns, Canning Vale, Canning Vale RDC, Capral Penrith, Cardiff, Deception Bay, Glenorchy, Kilburn, Kunda Park, Lynbrook, Townsville, Wangara, Welshpool, Winnellie and Wollongong were not audited.		
	Supply chain activities included in the Audit Scope:Semi-FabricationMaterial Conversion		
	All applicable criteria in the ASI Performance Standard were included in the Audit Scope.		
	<u>Surveillance Audit and Scope Change (30 October – 20 November 2024)</u> The Audit Scope covers the extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations at Bremer Park, Bremer		

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	Park RDC, Capral Penrith, Deception Bay, Huntingwood, Rockdale, Smithfield, and Townsville.				
	The Entity uses the ASI multi-site sampling approach and sites Angaston, Archerfield, Burleigh Heads, Cairns, Campbellfield, Campbellfield RDC, Canning Vale, Canning Vale RDC, Cardiff, Glenorchy, Kilburn, Kunda Park, Laverton, Lynbrook, Noble Park, Springwood, Townsville, Wangara, Welshpool, Winnellie and Wollongong were not audited.				
	Supply chain activities included in the Audit Scope:				
	Semi-Fabrication				
	Material Conversion				
	All applicable criteria in the ASI Performance Standard 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	2 June 2023 – 1 June 2026				
NEXT AUDIT TYPE	Re-Certification Audit				
NEXT AUDIT DATE	1 June 2026				
CERTIFICATE NUMBER	287				
	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.				
» — a ave — a — a = a	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

Capral (the 'Entity') is an Australian Aluminium extrusion company, publicly listed on the Australian Stock Exchange (ASX:CAA). It commenced operations in Australia in 1936 and is Australia's largest manufacturer and distributor of aluminium profiles, with net assets of approximately \$135 million. The Entity has a national footprint of world class aluminium extrusion plants, comprising of nine operating presses with an annual capacity of 74,000 metric tonnes. The Entity has an extensive distribution network, consisting of major distribution Facilities, as well as regional and metropolitan centres with an extensive range of products and logistics capabilities. The Entity is a major supplier to fabricators and distributors, focusing on the Residential, Commercial and Industrial segments. The Entity employs over 900 people within its operations throughout Australia, with significant industry skills and expertise.

For further information, refer to: https://www.capral.com.au/about-capral/our-story/

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	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	Medium	HIGH
OVERALL		HIG	ЭН	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has appropriate systems in place to maintain awareness, ensure compliance with Applicable Law and maintain a context- sensitive commitment to customary and/or traditional practices. This is evidenced by the Entity's legal registers, Code of Conduct, Business continuity plan, and relevant Policies.
1.2 Anti-Corruption	Conformance	The Entity has demonstrated a commitment to working against Corruption in all its forms, including Extortion and Bribery. Furthermore, it has ensured that anti-Corruption is managed in ways consistent with Applicable Law and relevant international standards as demonstrated in their Code of Conduct and reinforced by existing state audit law.
1.3a-e Code of Conduct	Conformance	The Entity has a comprehensive approach to maintaining its own integrity and that of its respective Stakeholders. The Capral Code of Conduct (October 2022) provides a standardised framework to guide Business and operational practices.
		It is publicly available and the Entity has ensured an effective systematic review and update process is included as a part of the Entity's activities. This has helped to ensure that changes to the organisation's documentation is reflective of any operational changes, as well as any ensuing impacts on environmental, social and governance related risks.
		https://www.capral.com.au/wordpress/wp- content/uploads/2019/03/Capral-Code-of-Conduct_Oct2022.pdf
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's relevant Environmental, Social and Governance (ESG) Policies and procedures remain sensitive to the need to incorporate senior management as a part of the implementation and review process. The Entity has successfully monitored and ensured that this is the case.
		The Entity has demonstrated leadership commitment by endorsing and periodically reviewing various Policies covering environmental, social and governance factors and by providing resources as needed for its implementation.
		The Entity has effectively communicated the Environmental, Social and Governance Policies to its Stakeholders.
2.2a-c Leadership	Conformance	The Entity has nominated one of its senior management personnel (Group ESG & Risk Manager) as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity maintains ISO 14001:2015, 45001:2018 and 9001:2015 certifications, which are subjected to annual audits by an independent accredited certification body.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity maintains ISO 14001:2015, 45001:2018 and 9001:2015 certifications, which are subjected to periodic audits by an independent accredited certification body. The Entity also upholds group-wide Policies that safeguard the social welfare of Stakeholders and implements specific ESG Management Plans customised to operational sites.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a system by which the Due Diligence for suppliers is managed in terms of environmental and social performance criteria. Key Policies and practices on Responsible Sourcing and Modern Slavery are in place and reviewed every five years. The Entity's Responsible Ethical Sourcing and Modern Slavery Policy is available at: https://www.capral.com.au/wordpress/wp-content/uploads/Ethical- Sourcing-and-Modern-Slavery-Policy.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	Where appropriate, the Entity has demonstrated a commitment to conducting relevant Impact Assessments understand baseline conditions, prospective impacts of its activities and necessary mitigation measures. The Entity has demonstrated that the Impact Assessments are periodically reviewed and updated.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable as the Entity is not required to conduct this Impact Assessment as no New Projects or Major Changes have occurred or are proposed. The assessment process however is documented in Environmental, Social and Governance Management Practices. No groups of Indigenous Persons were also identified by the current operations.
2.7a-f Emergency Response Plan	Conformance	The Entity has established site-specific Emergency Response Plans for each Facility, which are included in the Environmental, Social and Governance Management Plans. Emergency response drills are conducted in each site and relevant staff members are trained in First Aid/ CPR and Fire Warden procedures. All training and emergency drill records are stored on the Entity's internal platform (IMS).
		The Entity currently discloses publicly the Pollution Incident Response Management Plans (PIRMP's) for the Penrith and Smithfield Facilities. Emergency Response Plans for all other sites are available to interested parties on request.
		Penrith PIRMP is available at: https://www.capral.com.au/wpcontent/uploads/2024/03/Penrith- PIRMP.pdf
		Smithfield PIRMP is available at: https://www.capral.com.au/wp-content/uploads/2024/03/Smithfield- PIRMP.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Plan and a Risk Management System to navigate potential instances of operational Closure, Decommissioning or Divestment in the future.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has not been involved in any recent Mergers or Acquisitions and there are no plans for such arrangements in the near future. However, procedures outlined in its Environmental, Social and Governance Management Practices specify that ESG considerations

2.10a-b Closure, Decommissioning and		will be reviewed through a Due Diligence process in addition to
Decommissioning and		standard financial Due Diligence.
Divestment	Conformance	Whilst the Entity has not closed, decommissioned or divested any of its Facilities, it acknowledges the need to address environmental, social and governance issues and intends to do so if necessary, in the future. Specific procedures, outlined in its Environmental Social and Governance Management Practices, ensure that planning processes will be based on an ongoing assessment, identification, and mitigation of risks in accordance with the Entity's environmental and social Policies, practices, procedures, and plans.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's annual Sustainability Reports are published as part of their Annual Reports. The Annual Report 2023 includes a sustainability section, page 24, available at: https://www.capral.com.au/wp-content/uploads/2024/03/FY23-Full- Year-Results-Presentation.pdf
3.2 Non-compliance and Liabilities	Conformance	As a publicly-listed company, it is a legal requirement for the Entity to report through the Australian Stock Exchange (ASX) platform, the Entity publicly discloses information on an annual basis relating to Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.
3.3a-c Payments to Governments	Conformance	As part of the Entity's ESG Management Practices, procedures are in place ensuring any payments to the government made by or on its behalf have a solid legal and/or contractual basis. Financial auditing is undertaken as required by applicable law and/or directed by the Entity's risk control measures.
		The Entity's financial records, including payments to governments, are periodically third-party audited to ensure that the Entity meets its compliance obligations.
		https://www.capral.com.au/about-capral/general- information/annual-reports
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented an accessible, transparent, understandable and culturally and gender sensitive Dispute Settlement and Complaints Resolution to address all relevant Stakeholder Complaints, Grievances and information requests related to its operations.
		Corporate Governance: <u>https://www.capral.com.au/wp-</u> content/uploads/2023/12/Corporate-Governance-Statement- 2023.pdf
		Whistleblower Policy: <u>https://www.capral.com.au/wp-</u> content/uploads/2024/11/Whistleblower-Policy-2024.pdf
		Capral Code of Conduct: <u>https://www.capral.com.au/wp-</u> content/uploads/2024/11/Capral-Code-of-Conduct_Jan2025.pdf

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Life Cycle Assessment (LCA) framework to evaluate the environmental impacts of Aluminium production. The LCA report is available for all its production lines and Products.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity provides comprehensive 'cradle-to-gate' Life Cycle Assessment (LCA) information for its Aluminium (containing) Product(s) upon requested and responds promptly to customer inquiries and needs.
4.2 Product Design	Conformance	In collaboration with key clients, the Entity integrates techniques for optimal material consumption in the design and manufacturing process of the Products in terms of dies design, product profiles, and process engineering that minimises or eliminates Scrap and rejected material.
4.3a-b Aluminium Process Scrap	Conformance	The reduction of Aluminium Scrap is a key KPI in the Entity's Performance Hub software, providing evidence of its efforts minimise Aluminium Process Scrap across its operations.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non- Conformance	The Entity's ability to utilise End of Life Products from consumers was assessed in the Life Cycle Assessment. Scrap retrieval is reviewed annually and linked to site performance criteria, though recovery from customers is limited due to varying alloys and contamination risks. The Entity is developing a customer education program on circularity and best recycling practices, which is incorporated into its ESG plans. Additionally, the Entity's ESG Framework commits to increasing the circularity of Aluminium, sourcing lower-carbon Aluminium, and achieving a 20% Waste reduction by 2030, as outlined in its 2024
		Annual Report. However, the Entity's recycling strategy was not publicly available at the time of the Audit.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's ability to utilise End of Life Products from consumers was assessed in the Life Cycle Assessment. Scrap retrieval is reviewed annually and linked to the site performance criteria, though recovery from customers is limited due to varying alloys used and contamination risks. The Entity is developing a customer education program on circularity and best recycling practices, which is incorporated into its ESG plans.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity reports its total CO ₂ emissions in the 2024 Annual Report, discloses emissions through the Australian National Greenhouse Emissions Reporting (NGER) Scheme and publicly discloses its Scope 1, 2 and 3 emissions together with targets aligned to the 1.5°C pathway, which were developed using the ASI GHG Pathways Method and Calculation Tool.
		The Entity's Annual Report is available at: https://www.capral.com.au/wp-content/uploads/2025/03/2024-Full- Year-Results-Presentation.pdf The Entity's Emissions Performance Report is available at: https://www.capral.com.au/wp-

CRITERION	RATING	COMMENT
		content/uploads/2025/04/Capral_ASI_Emission_Report_2024.pdf
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	The Entity has reported its emissions to Australian schemes for a considerable length of time, including the National Pollutant Inventory (NPI) and the National Greenhouse and Energy Reporting (NGER) Scheme, and has disclosed its emissions reduction strategies in its Annual Reports.
		Additionally, the Entity has published its 2024 Emissions Performance Report, detailing Scope 1, 2, and 3 emissions, together with its reduction strategy and targets aligned with a 1.5°C pathway, calculated using the ASI GHG Pathways Method and Calculation Tool, available at: https://www.capral.com.au/wp- content/uploads/2025/04/Capral_ASI_Emission_Report_2024.pdf
5.4 GHG Emissions Management	Conformance	The Entity recognises the importance of managing carbon emissions to achieve its long-term carbon neutrality goals. The Entity has used the ASI GHG Pathways Method and Calculation Tool to monitor emissions and make informed decisions, with the data publicly disclosed on its website.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has established procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimise these impacts, as outlined in each site's ESG and Pollution Incident Response Management Plan at:
		https://www.capral.com.au/wp-content/uploads/2024/03/Penrith- <u>PIRMP.pdf</u> https://www.capral.com.au/wp-content/uploads/2024/03/Smithfield- <u>PIRMP.pdf</u>
		and Emissions Monitoring Data 2023 are available at: https://www.capral.com.au/wp-content/uploads/2024/03/2023- Public-Emissions.pdf
6.2a-g Discharges to Water	Conformance	The Entity has established procedures to quantify and report Discharges to Water that have adverse effects on humans or the environment and has implemented initiatives to minimise these impacts, as outlined in each site's ESG Plan, stored within the IMS Platform. No Material Discharges to Water have been identified.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed, mitigated, and managed its potential Spills and Leakages. It understands its major risk areas and ensures that external communications plans, Stakeholder guidelines, compliance controls and monitoring programs work together to detect and mitigate Spills and/or Leakages. The Entity has publicly disclosed its Pollution Incident Response Management Plan's (PIRMP's) for both the Penrith and Smithfield Facilities at: https://www.capral.com.au/wp-content/uploads/2024/03/Penrith- PIRMP.pdf https://www.capral.com.au/wp-content/uploads/2024/03/Smithfield-
		PIRMP.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented measures to ensure Spills are promptly reported and that an effective incident response plan is in place. Periodic incident reports, as mandated by regulators, communicate and publicly disclose Spills and the remediation actions taken.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management strategy that incorporates principles from the Waste Mitigation Hierarchy, as reflected in its site-specific Waste management plans. It has also quantified the amount of both Hazardous and Non-Hazardous Waste generated across operations. The Entity has publicly disclosed a Waste Management Report detailing Hazardous and Non-Hazardous Waste, as well as reductions in Waste and increases in recycling, measured against a 2022 baseline through 2024, available at: https://www.capral.com.au/wp- content/uploads/2025/04/Capral_ASI_Waste_Report_2024.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non- Conformance	The Entity monitors water withdrawal and use by source and type at each site through its ESG Plans and has assessed water-related risks in its Area of Influence for each site. However, it has not yet publicly disclosed the water withdrawal and source and type for each site.
7.2a-e Water Management	Minor Non- Conformance	The Entity has developed individual water management plans for each site and conducted comprehensive risk assessments, which are recorded internally. However, the information has not yet been publicly disclosed.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed that its operations do not pose significant and Material risks to Biodiversity or land-use related activities within its Area of Influence. A systematic review process was conducted to identify pertinent Biodiversity risks, as documented in the corresponding ESG Plans for each operational site.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable as the Entity's operational effects on Biodiversity and Ecosystem Services are minimal to negligible, as the Facilities are in highly industrial areas/zones.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as the Entity's operational effects on Biodiversity and Ecosystem Services are minimal to negligible, as the Facilities are in highly industrial areas/zones.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as the Entity's operational effects on Biodiversity and Ecosystem Services are minimal to negligible, as the Facilities are located in highly industrial areas/zones.
8.4 Alien Species	Conformance	The Entity adheres to cross-border regulations and implements extensive processes and procedures to prevent the accidental or deliberate introduction of Alien Species. It has conducted Alien Species assessments for each Facility and has evaluated the associated risks to its immediate surroundings, which are generally considered low after control measures are implemented.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is committed to avoid operating in World Heritage Properties as outlined in its ESG Management Plans. It has no plans to explore or develop New Projects requiring additional land in the near future.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as the Entity's Facilities are in highly industrial areas/zones, not adjacent or near any Protected Areas, nor has impact on these 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	Conformance	The Entity acknowledges its social and civic responsibilities and ensures it operates in a way that fulfils its responsibilities to employees, host Communities, and other Stakeholders. By adhering to its Code of Conduct, relevant Policies, and ESG Management Plans, the Entity ensures to observe the UN Guiding Principles on Business and Human Rights as well as the relevant laws in Australia, which incorporate all Human Rights requirements set by various international accords and conventions.
		The Entity's Human Rights Policy is outlined in the Modern Slavery Policy 2023, available at: https://www.capral.com.au/wp-content/uploads/2024/07/Modern- Slavery-Statement-2023-Final.pdf

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is required to report gender equality requirements annually to the Workplace Gender Equality Agency (WGEA). The Report is published on both the Entity's website and WGEA website at: https://www.wgea.gov.au/Data-Explorer/Employer
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples 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 Indigenous Peoples 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 Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no identified Cultural and Sacred Heritage features 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 identified Cultural and Sacred Heritage features within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no instance of Displacement during the construction and operation of the Entity.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as there are no residential communities near any of the Entity's Facilities. However, the Entity proactively conducts Environment and Social Impact Assessment (ESIA) and implements engagement plans for New Projects to identify and mitigate any potential adverse impact on Local Communities' rights and interests.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices framework which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high-risk issues are identified.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices framework which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high-risk issues are identified.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices framework which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high-risk issues are identified.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices framework which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Policy and Modern Slavery Statement which discuss Conflict- Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified. The Entity will report on its Due Diligence through its Annual Report. The Entity also reports on its Modern Slavery activities annually: <u>https://www.capral.com.au/wp-</u> content/uploads/2024/07/Modern-Slavery-Statement-2023-Final.pdf
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity as it does not engage any security personnel at any of its Facilities.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity continues to negotiate Enterprise Bargaining Agreements in compliance with relevant legislation at each site, allowing Workers the option to join an associated union, which are present at the negotiations of the Agreements. It was noted that the Electrical Trade Union (ETU) and the Australian Workers Union (AWU) remain prominent and active unions across the Entity's 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 since the Freedom of Association and Right to Collective Bargaining are protected by the Fair Work Act (Commonwealth) 2009 in Australia. Each site has its own enterprise agreement, which is negotiated under section 185 of the Fair Work Act (Commonwealth) 2009.
10.2a-c Child Labour	Conformance	The Entity complies with the <i>Fair Work Act (Commonwealth) 2009</i> and Responsible Sourcing and Modern Slavery Policy, which align with the National Employment Standards (NES). These standards set the minimum working age at 18, except for apprentices who may start at 16, but must not engage in physical labour until they turn 18.
10.3a-c Forced Labour	Conformance	The Entity commits to preventing, mitigating and where appropriate, remedying Modern Slavery in its operations and supply chains, as stated in its Responsible Sourcing and Modern Slavery Policy. It does not engage in or support Human Trafficking in any form, either directly or through contract labour agencies. The Entity's Responsible Sourcing and Modern Slavery Policy is available at: <u>https://www.capral.com.au/wp-</u>

CRITERION	RATING	COMMENT
		content/uploads/2024/11/Responsible-Sourcing-and-Modern-Slavery- Policy-2024.pdf
10.4a-c Non-Discrimination	Conformance	With its Diversity and Inclusion Policy and adherence to the Workplace Gender Equality Agency reporting, the Entity promotes equal opportunities and prohibits Discrimination in all aspects of employment, including hiring, salary, promotion, training, advancement and termination. This policy applies to all employees regardless of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other characteristic that could lead to Discrimination, available at: https://www.capral.com.au/wp-content/uploads/2023/12/Diversity- and-Inclusion-Policy.pdf
10.5 Communication and engagement	Conformance	The Entity fosters open communication and direct engagement with its employees and their representatives to address working conditions and resolve workplace and compensation issues, free from reprisal, intimidation, or Harassment. The Entity's Policies and various communication channels for Grievances and appeals are made accessible to employees from the time of recruitment. The Entity has also established a Dispute Settlement and Complaints Resolution management practice, an employee Code of Conduct and a Complaints and Grievance mechanism to ensure that Workers can raise concerns without fear of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity prohibits corporal punishment, mental or physical coercion, Harassment, and gender-based Violence. It provides multiple Grievance channels and procedures for employees to appeal disciplinary decisions. The Entity's Code of Conduct and all Policies are communicated to all employees, including new hires and state that Discrimination, bullying and/ or Harassment are not tolerated, with business practices and Grievance mechanisms in place. The Entity's Code of Conduct, which includes a Violence and Harassment Policy is available at: https://www.capral.com.au/wp-content/uploads/2024/11/Capral- <u>Code-of-Conduct_Jan2025.pdf</u>
10.7a-c Remuneration	Conformance	The Entity offers its employees competitive salary packages with attractive allowance schemes that are more than sufficient to meet their basic needs. Whether covered by awards or not, all salary packages exceed legal or industry minimum wage standards.
10.8a-c Working Time	Conformance	The Entity ensures that its employees' work hours comply to federal labour laws and has established procedures for Overtime work. The Entity regularly monitors the total working hours of each employee to ensure compliance with Australia labour laws.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that all employees are aware of their rights by upholding the <i>Fair Work Act (Commonwealth) 2009</i> and Enterprise Bargaining Agreements and maintains access to all appropriate channels of communications. All employees have undergone on- boarding training sessions that emphasise their rights and obligations.

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an integrated Management System to oversee Occupational Health and Safety (OH&S) for both staff and assets throughout all Facilities. It holds ISO 45001 certification for its OH&S Management System and undergoes annual external audits by a recognised certification body to ensure compliance.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has established an integrated Management System certified to ISO 45001:2018 and publicly reports its Total Recordable Incident Frequency Rate (TRIFR), including peer comparisons, available at: https://www.capral.com.au/wp-content/uploads/2025/03/2024-Full- Year-Results-Presentation.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a mechanism for all Workers and their Health and Safety representatives to raise, discuss and resolve OH&S issues with management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 June 2023	Initial Certification Audit – Full Certification
1	12 May 2025	Surveillance Audit and Scope Change Scope Change to include Archerfield and Noble Park sites. Change of Auditing Firm to Sustainable Certification Pty. Ltd. Correction to Revision 0 to list all sites included in the Certification Scope and list the sites audited in the Audit Scope description.