

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Kaiser Aluminum Warrick LLC

CERTIFICATE NUMBER  
129

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL  
PROVISIONAL  
CERTIFICATION\*

ASI ACCREDITED  
AUDITING FIRM  
ERM CERTIFICATION  
AND VERIFICATION  
SERVICES

DATE OF ISSUE  
16 FEBRUARY 2025

DATE OF EXPIRY  
15 FEBRUARY 2026

CERTIFIED SINCE  
17 MAY 2021

AUTHORISED BY

CERTIFICATION SCOPE

Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)

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

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Kaiser Aluminum Corporation
ENTITY NAME	Kaiser Aluminum Warrick LLC
CERTIFICATION SCOPE	Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (21 March 2021)</li><li>• Surveillance Audit (1 – 5 November 2021)</li><li>• Surveillance Audit (19 – 22 September 2023)</li><li>• Re-Certification Audit and Scope Change (3 – 6 December 2024)</li></ul>
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none"><li>• 21 March 2021 (Initial Certification Audit)</li><li>• 1 – 5 November 2021 (Surveillance Audit)</li><li>• 19 – 22 September 2023 (Surveillance Audit)</li><li>• 3 – 6 December 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 1 April 2021 (Initial Certification Audit)</li><li>• 20 January 2022 (Surveillance Audit)</li><li>• 13 August 2024 (Surveillance Audit)</li><li>• 14 February 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (21 March 2021)</u></p> <p>The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (March 2021), access to the Entity was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>

Surveillance Audit (1 – 5 November 2021)

The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

Surveillance Audit (19 – 22 September 2023)

The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

Re-Certification Audit and Scope Change (3 – 6 December 2024)

The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Provisional 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	16 February 2025 – 15 February 2026
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	15 August 2025
CERTIFICATE NUMBER	129



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

Kaiser Aluminum Corporation (the 'Entity') is located in Newburgh, Indiana USA and operates a cast house, hot mill, cold mills, finishing mills, coating lines and produces flat rolled Aluminium sheets for the food and beverage container market. The Entity employs approximately 1,200 people and produces a wide range of packaging products including coated food stock, end and tab stock, bottle and can body stock.

The Entity's parent company, Kaiser Aluminum Corporation commenced operating in 1946 and is headquartered in Franklin, Tennessee USA and operates 13 production Facilities across North America which produces a variety of highly specialised products for Aerospace and High Strength Packaging, general engineering and automotive applications. Kaiser Aluminum Corporation generates approximately \$1.2 billion USD per annum and sells products for both local and international customers.

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity is supported by a dedicated in-house legal team and third-party counsel, ensuring adherence to Applicable Laws across all operational jurisdictions. The Environmental Department maintains a comprehensive legal registry and develops process-specific compliance manuals. Regular employee training and bi-weekly legal updates are also undertaken. Compliance audits are conducted triennially, with action items tracked. The Entity uses tools including compliance calendar trackers and reports to ensure timely completion of environmental tasks.
1.2 Anti-Corruption	Conformance	The Entity has developed corporate Policies including the Code of Business Conduct and Ethics and the Supplier Code of Conduct, which apply to all employees and Contractors. These Policies have established the rules for Business Entertainment and Gifts and prohibit Bribery. These rules are displayed on the Entity's website, and the Policies are available at: <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Business Conduct and Ethics for its employees and a Supplier Code of Conduct tailored to its suppliers, both are available on the Entity's website: <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a> The Code of Business Conduct and Ethics is communicated annually to all Workers and the Human Resources Department provides training.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's site-specific Environmental, Health and Safety (EHS) Policy is communicated annually to Workers and the Community Advisory Board, with changes approved by the EHS Lead Team. The Environmental Department maintains additional environmental management Policies, whilst the Human Resources Department provides governance and social policies upon request. These include diversity, equity, inclusion, Human Rights, conflict mineral sourcing, and corporate governance guidelines. The integrated environmental Policy emphasises safety and hygiene, outlining commitments and expectations for Workers and Contractors. Monthly 'Measuring Our Business' (MOB) presentations are provided by the Entity's Plant Manager and an annual EHS Policy reminder in July reinforces these Policies.  Integrated environmental, social and governance Policies are available at: <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a>
2.2a-c Leadership	Conformance	The Entity has nominated several senior Management Representatives with different responsibilities and authorities to ensure conformance to the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and maintains a robust Environmental Management System overseen by the Environmental Department. This system includes a comprehensive list of site-specific environmental aspects and impacts, reviewed annually to assess actual and

CRITERION	RATING	COMMENT
		potential risks. High-scoring aspects are marked as 'significant' and require action plans, with management direction playing a key role in this determination. Records are managed as per the Records Retention Policy. Workers receive the necessary training to prioritise and address environmental concerns effectively. Local Stakeholder interests are also considered in the scoring process.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System based on the Diversity, Equity, Inclusion, & Belonging Policy and its Human Rights Policy, and the Entity's procedures.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has enforced corporate Policies for all on-site Contractors and suppliers, which are based on the Code of Business Conduct and Ethics and the Supplier Code of Conduct, available at: <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a></p> <p>These Policies outline the commitments expected from Contractors regarding Human Rights, Safety, Hygiene, Environmental, Legal Compliance, and Labour Rights. A third-party service, 'In Touch,' manages a communication channel for reporting complaints or non-compliances related to these Policies. Additionally, a toll-free reporting hotline (1-866-204-9793) and an email contact (<a href="mailto:info@getintouch.com">info@getintouch.com</a>) are available for both Workers and Stakeholders.</p>
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity has established a Management of Change Approval process that applies to New Projects or Major Changes. This process ensures that any Major Change generating new or existing impacts must be assessed and approved by the EHS Manager. However, during the Audit the Entity was unable to provide information regarding Impact Assessments for social and cultural topics.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	The Entity has established a Management of Change Approval process that applies to all Workers and Stakeholders. This process ensures that any Major Change generating new or existing impacts must be assessed and approved by the EHS Manager. However, during the Audit the Entity was unable to provide specific information regarding Impact Assessments for social, cultural and Human Rights.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Action Plan and maintains an Oil Spill Prevention, Control, Countermeasures, and Facility Response Plan (specific for Oil Spills). The Entity conducts an annual review of each program which is updated as required. The Emergency Response Plan is publicly available upon request. Additionally, the Plan has been provided to the Environment Protection Agency (US EPA).
2.8a-d Suspended Operations	Conformance	The Entity demonstrates its commitment to Business resilience through its comprehensive Recession Plan. This five-year strategy, designed to navigate a potential three-year deep recession followed by a two-year recovery, is meticulously reviewed and updated annually. The Board of Directors of the Entity's parent company conducts quarterly reviews to ensure strategic alignment and readiness. In a catastrophic trigger event, the Plan is promptly adapted and enacted to safeguard liquidity and operational stability.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity reviews its environmental, social and governance issues as part of its Due Diligence processes for mergers, acquisitions and divestments.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity reviews its environmental, social and governance issues as part of its Due Diligence processes for closure, decommissioning and divestment activities.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and Material environmental, social and economic impacts and performance. This information is published annually in the Kaiser Sustainability Report and includes consolidated data:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p> <p>Kaiser Aluminium Corporation annually publishes financial information and other elements of performance and governance as required under the Securities Exchange Act 1934 (Form 10-K), which is available on the government website at: <a href="https://www.sec.gov">https://www.sec.gov</a>  The quarterly financial statements are also available at: <a href="https://investors.kaiseraluminum.com/overview/default.aspx">https://investors.kaiseraluminum.com/overview/default.aspx</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity reports and publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with the Applicable Law in its annual Financial and Sustainability Reports.  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity does not have, nor is associated with any political parties or committees and does not make any payment to the Government other than for taxation requirements. The quarterly financial statements are available at:  <a href="https://investors.kaiseraluminum.com/overview/default.aspx">https://investors.kaiseraluminum.com/overview/default.aspx</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established mechanisms to address complaints, claims, or requests for information. It has an open line (toll-free 1-866-204-9793) and an email account ( <a href="mailto:info@getintouch.com">info@getintouch.com</a> ) for all Stakeholders to report grievances and request further Information.
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity maintains a Life Cycle Assessment (LCA) Report of its major production lines (i.e. Plate, Sheet and Coil, Food and Beverage, Can Sheet, Soft Alloy Extrusions, Seamless and Structural Extruded and Drawn Tube, Hard Alloy Rod and Bar, wire and Rod, Redraw Rod, Forge Stock and Hard Alloy Shapes) undertaken by a third-party. The LCA adheres to the same methodology used by the International Aluminium Institute (IAI) and the methodology used in the assessment for intermediate product manufacturing according to the European Aluminium Association project.</p> <p>The Entity has expansion activities in progress and as a result, potentially material changes to its operations, so this LCA will be updated once these changes impact the site.</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has developed a 'cradle-to-gate' LCA which can be provided upon request. At the time of the Audit, the Entity has not received requests to communicate the results of the Life Cycle Assessment information.
4.2 Product Design	Conformance	Whilst the level of input by the Entity into the design of its products is limited as this is strictly determined by each customer, the Entity does implement changes to its own internal processes where it is able to carry out and ensure reductions in raw product loss.
4.3a-b Aluminium Process Scrap	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. The Entity separates Aluminium alloys and grades for recycling where available.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established processes to obtain and recycle the material Scrap generated from Aluminium, which is then reprocessed and recycled. It undertakes campaigns to promote recycling through local media, as well as installing collection points or containers within the Local Community.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity manages and provides Greenhouse Gases (GHG) emissions data to Kaiser Aluminium Corporation and has implemented a process for data analysis, a methodology for calculating and recording Material GHG emissions and energy use is documented by source. GHG Emissions data are provided on a monthly basis to Kaiser Aluminium Corporation which is aggregated for disclosure in the Sustainability Report. The Entity also annually reports its GHG emissions to the relevant Government Authority, which are publicly disclosed on the government website.</p> <p>However, the GHG emissions data have not yet been independently verified by a third party. Refer to the 2023 Sustainability Report, pages 23-24:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Major Non-Conformance	<p>The Entity has established GHG Emissions intensity reduction and time-bound targets and has implemented a GHG Emissions Reduction Plan consistent with a 2°C warming scenario. The GHG reduction targets and plans are outlined in the 2023 Sustainability Report, pages 20-22:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p> <p>The Entity has stated that by 2030 it will reduce Scope 1 &amp; 2 emissions by 20% and Scope 3 emissions by 35% with a combined reduction of 30%.</p> <p>However, the Entity has not been able to establish a GHG Emissions Reduction Plan and ensure a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario and has not publicly disclosed its emissions reduction pathway curves.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented the necessary procedures, management system framework and associated operating controls to achieve performance aligned with the GHG Emissions Reduction Plan and targets which includes specific steps, targets and actions.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity quantifies and reports its Emissions to Air, complying with quarterly, semi-annual and annual reports. The Entity holds a valid Air Permit issued by local authorities. However, the site aspects and impacts matrix for air related impacts addresses normal operations only and does not identify air related emergency and adverse impacts. Refer to the 2023 Sustainability Report, pages 23-24:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity quantifies and reports its Discharges to Water that could adversely affect humans or the environment and implements plans to minimise these adverse impacts. The Entity operates under a water discharge agreement that was originally established under the previous owner (Alcoa), who still holds the discharge permit. The permit establishes the terms of Discharge to Water and is required by local laws and regulations.</p> <p>However, the site aspects and impacts matrix for water related impacts addresses normal operations only and does not identify water-related emergency and adverse impacts. Refer to the 2023 Sustainability Report, page 30:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an Aspects and Impacts Assessment to identify major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. This is required under the Indiana Department of Environmental Quality Title V Permit and a contractual obligation with Lessor's National Pollutant Discharge Elimination System (NPDES) Permit.</p> <p>The Entity has developed and implemented a Spill Prevention, Control and Countermeasures Plan. The Entity has also established controls as part of regulatory requirements for any Spills or Leakages.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has a legal obligation under the Local Environmental Laws to disclose to affected parties the volume, type, and potential impact of significant Spills immediately after an incident. This is also a requirement of Spill prevention, control and 'countermeasure' regulations and as part of the Entity's Facility Response Plan (FRP).</p> <p>The Entity maintains a section in the 2023 Sustainability Report titled 'Waste and Spill Management' regarding its policy to publicly disclose any Material Spill or Leakage and related information annually, pages 27-29:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p> <p>The Entity outlines the reporting criteria and responsibilities and who internally and externally needs to be informed based on the severity of the occurrence, either by type of Spill or amount, in its Facility Response Plan (FRP).</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's Waste Management Plan includes the identification, classification, point(s) of generation, descriptions, storage, methods of disposal, inspection frequency, and accountability of all waste streams. Each waste stream is accompanied by a detailed procedure and respective forms.</p> <p>The Entity is regulated under Local Environmental Laws and classified as a large quantity generator to disclose the quantity of Hazardous and Non-Hazardous Waste generated and associated Waste disposal methods. Some of this information is publicly available through the authority website: <a href="https://enviro.epa.gov/facts/tri/ef-facilities/#/Facility/4763WKSRLM4WSTA">https://enviro.epa.gov/facts/tri/ef-facilities/#/Facility/4763WKSRLM4WSTA</a></p> <p>The total Hazardous Waste generation is publicly disclosed through its 2023 Sustainability Report, page 29:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>The Entity has implemented processes for Dross recovery and storage, including internal storage, and requirements for transportation. The Entity ensures maximum recovery of Aluminium by treating Dross and Dross residues through a third-party Contractor.</p> <p>The Entity maximises the recovery of Aluminium by treating Dross and Dross residues through the implementation of processes for on-site Dross management, transportation of Dross, selection of Dross processors and the management of Dross residues. The Entity uses a third party for the recovery of Dross and to monitor recovery yields.</p> <p>The Entity regularly reviews alternative options for landfilling its Dross residues. The (US) Aluminium Association, which provides global standards, industry statistics, and expert knowledge to member companies and Policymakers in the United States, supports these outcomes.</p>

## 7. WATER STEWARDSHIP

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified its Water withdrawal and uses by source and type to ensure the sustainable management and protection of water resources and ecosystems in and around its environment. Refer to the 2023 Sustainability Report, page 30:  <a href="https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p> <p>As contractually required by the Lessor and local authority, it adopts a catchment-based approach.</p> <p>The Entity has assessed its Water Risks in Watersheds within its Area of Influence. A Water Risk Assessment was conducted in conjunction with the regulatory authority and no adverse impacts to the Watershed were found.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the water risks have been assessed as low and there are no Material risks.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	Whilst the Entity has completed a Biodiversity and Ecosystem Risk assessment, it is out of date (2000) and does not include specific risk categories for Biodiversity and Ecosystem risks, and therefore it is currently unable to identify any low risk impacts that may not require specific action plans.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	Whilst the Entity has completed a Biodiversity and Ecosystem Risk assessment, it is out of date (2000) and does not include specific risk categories for Biodiversity and Ecosystem risks, and therefore it is currently unable to identify any low risk impacts that may not require specific action plans.
8.2a-g Biodiversity Management	Minor Non-Conformance	<p>The Entity's Biodiversity risk assessment has determined that there are no Material risks within their Area of Influence; therefore, no action plans are required. Additionally, the Entity shares the results of its Biodiversity risk assessment with the Local Community Advisory Board as part of its Stakeholder communication process.</p> <p>However, the Biodiversity Action Plan presented as evidence was developed some time ago and has not been updated since 2000.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as there are no Priority Ecosystem Services identified, and the Entity does not depend on Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The Biodiversity assessment has identified wooden pallets as a potential medium for the introduction of Alien Species. The Entity mitigates this potential by requiring the pallet supplier to treat the wooden pallets prior to use.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not operating in or adjacent to a World Heritage Area, nor plans to in the future.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Minor Non-Conformance	According to the Biodiversity Risk Assessment, there are no designated Protected Areas adjacent to, or in immediate proximity of the Entity. However, the designated Area of influence in the Biodiversity risk assessment only reflects the boundary of the operating Facility and does not consider the area outside this boundary.
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	Conformance	<p>The Entity maintains a Human Rights Policy which establishes a commitment to respect Human Rights. The Policy is available on the Entity's website and is communicated to Workers during onboarding. The Entity's Policies are guided by the International Bill of Human Rights principles and the International Labor Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work.</p> <p>The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its Business, including a Policy commitment to respect Human Rights, a Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on Human Rights, and as such impacts are identified, provides for remediation through legitimate processes.</p> <p>For further information, refer to the Human Rights Policy, which is available at: <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented Policies including the Code of Business Conduct and Ethics and the Diversity, Equity, Inclusion &amp; Belonging Policy, which describes its commitment to equal opportunities in all aspects of employment. It has also maintained its gender equity strategy, which is focused on equity and strengthening women's network actions.</p> <p>Gender and minority representation at the Entity, including the performance of relevant actions, are disclosed in the 2023 Sustainability Report, page 41:  <a href="https://webtest.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://webtest.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as the site is in a location where there are no Indigenous Peoples or their lands, territories and resources.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as the site is in a location where there are no Indigenous Peoples or their lands, territories and resources.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as the site is in a location where there are no Indigenous Peoples or their lands, territories and resources.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's Due Diligence process did not identify any sacred or cultural heritage sites and values within its Area of Influence. Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within their Area of Influence are present. Indigenous peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as confirmed by interviews, the Entity did not require the resettlement or cause the displacement. The Entity's senior management confirmed that this displacement would not be required if there were any planned New Projects or Major Changes in future.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. This is reflected in the Entity's Policies, including the Diversity, Equity, Inclusion, and Belonging Policy, the Human Rights Policy, the Supplier Code of Conduct, and the Environmental Policy.</p> <p>The Entity has a Community Advisory Board (CAB) to function as a sounding board and voice within the community. The CAB meets quarterly and typically receives updates on the Business, organisational changes, environmental performance and community outreach activities. To obtain additional feedback from the community, the Entity' conducts a biannual Community Feedback Survey.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity states in its Supplier Code of Conduct that it expects its suppliers to comply with all laws and regulations relating to Human Rights and conflict minerals, including providing a claim of assurance that the products have been manufactured using minerals sourced from conflict-free countries. The Kaiser Aluminium Corporation (which includes the Entity) also requires suppliers to have internal processes in place for sourcing conflict-free minerals.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Minor Non-Conformance	The Entity states in its Supplier Code of Conduct that it expects its suppliers to comply with all laws and regulations relating to Human Rights and conflict minerals, including providing a claim of assurance that the products have been manufactured using minerals sourced from conflict-free countries. The Kaiser Aluminium Corporation (which includes the Entity) also requires suppliers to have internal processes in place for sourcing conflict-free minerals. However, the Entity has not performed a specific 'red flag' assessment or equivalent to assess the entire supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Minor Non-Conformance	The Entity states in its Supplier Code of Conduct that it expects suppliers to comply with all laws and regulations relating to Human Rights and conflict minerals, including providing a claim of assurance that the products have been manufactured using minerals sourced

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		from conflict-free countries. However, as the Entity has not performed a specific 'red flag' assessment or equivalent, it has in turn has not developed an appropriate strategy.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	Whilst the Entity's Sustainability Report addresses some aspects of Due Diligence, and makes mention that new systems and processes are to be introduced to enhance monitoring of suppliers, the Entity was unable to demonstrate its up-to-date performance with respect to its Due Diligence assessment.
9.9 Security practice	Conformance	The Entity directly employs security staff who are subject to the same Policies and provides the same induction training as other Workers regarding respect for Human Rights in accordance with recognised standards and good practices.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, which is governed by both State and National law.</p> <p>The Entity declares in its Policies that it respects Workers' rights to Freedom of Association and Collective Bargaining, which is aligned with Kaiser's corporate values. This is reflected in its current conditions, where most of the Entity's Workers are unionised.</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity does not operate in a country (United States) that restricts the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	<p>The Entity does not support, nor engages in the use of Child Labour and complies with related national and international law. The Entity's Human Rights Policy refers to accepted labour practices. There are no instances of engaging in or supporting the Worst Forms of Child Labour.</p> <p>This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its Contractors to not engage in, nor support Child Labour.</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Supplier Code of Conduct, which establishes the requirements for its Contractors not to engage in, nor support Forced Labour.</p> <p>The Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.</p>

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		The Entity, however, does not currently have a 'stand-alone' Modern Slavery Statement detailing the actions to address modern slavery.
10.4a-c Non-Discrimination	Conformance	The Entity has established processes that ensure equal opportunity in its hiring practices and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities, or termination of any Worker based on gender, race, national or social origin, religion, or age. The Collective Bargaining Agreement reinforces corporate Policies on equal employment opportunities, Human Rights, and the Code of Business Conduct and Ethics at the local level.
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolving workplace and compensation issues. The Entity has implemented different mechanisms to address complaints, claims or requests for information. The Entity has an open line (toll-free 1-866-204-9793) and an email (<a href="mailto:info@getintouch.com">info@getintouch.com</a>), known as InTouch, operated by a third party, available 24/7 where Stakeholders can make anonymous reports if desired, reporting any matter related to the Code of Business Conduct and Ethics, accounting, audit, Harassment, Discrimination and theft.</p> <p>The Entity's Board of Directors supports this program and follows up on the closure of cases. More information on this program is available at: <a href="https://www.kaiseraluminum.com/files/compliance/InTouch.pdf">https://www.kaiseraluminum.com/files/compliance/InTouch.pdf</a></p>
10.6a-g Violence and Harassment	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. The Entity's Policies, including its Supplier Code of Conduct, reflect these actions. These Policies are publicly available on the Entity's website ( <a href="https://www.kaiseraluminum.com/document-library">https://www.kaiseraluminum.com/document-library</a> ) and communicated to all Workers via training.
10.7a-c Remuneration	Conformance	<p>The Entity continues negotiating the wages for unionised employees with the United Steel Workers Union. These are established following the Collective Bargaining Agreement, and the Remuneration package for all employees exceeds the national minimum wage.</p> <p>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. The wages paid by the Entity are more than the United States national minimum wage and are sufficient to meet the basic needs of Workers and to provide discretionary income. Payments are made in a timely manner, in legal tender and fully documented.</p>
10.8a-c Working Time	Conformance	The Entity has implemented Policies and processes to comply with Applicable Law and industry standards regarding Working Time, including Overtime hours, public holidays and paid annual leave. The existing Overtime framework ensures Workers have an average of one day off per seven-day period and that their average workday is eight hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity has implemented several measures to ensure comprehensive labour rights awareness. New State and Federal Labor Law Posters have been placed in all departments. The Trade Union meets with Workers on their first day of orientation to discuss Union

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		onboarding. For salaried new hires, an onboarding schedule within the first two weeks of employment includes sessions with the Union to communicate on labour rights.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	Whilst the Entity has most components of an Occupational Health and Safety (OH&S) Management System implemented, however, some components are not fully documented. These include organisational context, leadership & Worker participation, planning and support, performance evaluation and improvement opportunities.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity is pending an integral OH&amp;S Management System review as it has not yet been documented with all components of an OH&amp;S Management System. Whilst the Entity has undertaken peer comparisons on the OH&amp;S performance, information as to this is not currently disclosed. Facility hazard and protection programs are audited every three years, or more frequently by internal and external Aluminium industry safety experts.</p> <p>The Entity's OH&amp;S performance metrics are reported in the 2023 Sustainability Report, pages 44-45:  <a href="https://webtest.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf">https://webtest.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity is contractually obligated to provide Workers with mechanisms by which they can raise, discuss, and participate in the resolution of OH&S issues with senior management. The Entity has processes where each department has elected safety representatives based on shift, area or activity who can raise, discuss and participate in the resolution of OH&S issues with senior management.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 April 2021	Initial Certification Audit – Provisional Certification
1	16 February 2022	Surveillance Audit – Full Certification
2	12 November 2024	Surveillance Audit
3	23 May 2025	Re-Certification Audit and Scope Change; Scope Change to apply ASI Performance Standard V3. Correction to the 'Comment' for Criterion 4.2 in Rev 2 as the Criterion is within the Entity's Certification Scope.