

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

KOBE STEEL LTD. Chofu Works Aluminum Extrusion & Fabrication Plant

CERTIFICATE NUMBER

454

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

ERM CERTIFICATION
AND VERIFICATION
SERVICES

DATE OF ISSUE

22 MAY 2025

DATE OF EXPIRY

21 MAY 2028

CERTIFIED SINCE

22 MAY 2025

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

CERTIFICATION SCOPE

Manufacture of Aluminium
extrusion and fabrication products
at the Chofu Works Extrusion and
Fabrication Plant located in
Yamaguchi, Japan.

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

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Kobe Steel, Ltd.
ENTITY NAME	KOBE STEEL LTD. Chofu Works Aluminum Extrusion & Fabrication Plant
CERTIFICATION SCOPE	Manufacture of Aluminium extrusion and fabrication products at the Chofu Works Extrusion and Fabrication Plant located in Yamaguchi, Japan.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">22 - 31 January 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 February 2025
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium extrusion and fabrication products at the Chofu Works Extrusion and Fabrication Plant located in Yamaguchi, Japan.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- ✓ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ✓ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	22 May 2025 – 21 May 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	21 November 2026
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CERTIFICATE NUMBER	454
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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.

ENTITY OVERVIEW

Kobe Steel's Chofu Works facility (the 'Entity') is located within an area allocated for industrial activity by the City Planning Act in Shimonoseki city, Yamaguchi, Japan. The Entity commenced operations in 1939 with an Aluminium alloy material plant, which later expanded in 1945 to include the production of copper and copper alloys. The Entity covers a total footprint of 371,300 square metres (m²).

The Entity comprises of the Aluminium division, which relates to this Certification Scope, and the Entity's Copper division which is not included in the ASI Certification Scope. Various ancillary systems exist that are shared by both divisions, which include a Quality Assurance and Control (QA/QC) Department, a Research and Development (R&D) division, a maintenance workshop, an administrative building, an employee cafeteria, utilities (i.e. wastewater treatment plant and waste storage, electrical generators and chemical storage).

Key products from the Entity's Aluminium division include air conditioner parts (pistons), train bodies, impellers, door beams, bumpers and Auto Braking Systems (ABS). Key activities undertaken at the Entity include mixing, melting, Casting, heating, extruding, inspection, hardening, cutting, tempering, inspection, packaging and shipping.

Key external Stakeholders include the local regulator of Shimonoseki city. Although commercial activities and residences are located close to the boundary of the site (500m away), there have been no complaints received from external Stakeholders. There are no confirmed changes or expansions planned for the Entity in the near future.

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	Medium	MEDIUM
RISKS	High	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity subscribes to an external service (LexisNexis) to identify updates to legislation related to Environmental, Health and Safety (EHS) and Social (including both local and National level) aspects. Once updates are received and reviewed by the Corporate team, the information is cascaded to the General Affairs team for implementation.</p> <p>EHS compliance audits are conducted on an annual basis by the Entity with no non-compliances identified to date.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity's Anti-Bribery Policy is publicly available on the company website at: https://www.kobelco.co.jp/english/about_kobelco/kobesteel/ethics-compliance/files/anti-bribery_e.pdf</p> <p>In addition, the processes relating to the management of compliance (including management of anti-Corruption practices) are also summarised at: https://www.kobelco.co.jp/english/about_kobelco/kobesteel/ethics-compliance/index.html</p> <p>No cases of Corruption or Bribery have been identified to date.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity's Code of Conduct is within the five-year timeline for review. Employees are trained on the Code of Conduct as per Kobelco's Compliance Manual Conduct Guide for Employees. This Code is publicly available and as part of the 'Next 100 Project' specified under the Integrated Report 2024. Efforts are being made to promote the KOBELCO Corporate Philosophy throughout the Group. Refer to: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The fundamental principles and initiatives regarding Environmental, Health & Safety (EHS) and corporate governance for Kobelco group are summarised at: https://www.kobelco.co.jp/english/about_kobelco/kobesteel/governance/files/Basic_Policy_and_Initiatives.pdf and https://www.kobelco.co.jp/english/about_kobelco/csr/files/20_environmental_en.pdf</p> <p>These are publicly available and reviewed on an annual basis by the Entity's Corporate team.</p>
2.2a-c Leadership	Conformance	<p>Two Senior Managers have been appointed to oversee the implementation and communication aspects of the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has established an ISO 14001: 2015 certified Environmental Management System.</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a Social Management Systems where the Sustainability Promotion Committee identifies issues, formulates plans, and monitors sustainability activities, including Social (both Corporate Social Responsibility (CSR) and Human Resources (HR) are part of this Committee), based on the Entity's Sustainability Promotion Committee Regulations.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity's CSR Procurement Basic Policy was implemented in June 2022 and is publicly available at: https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-policy_e.pdf</p> <p>The Kobelco Corporate Office assesses suppliers for operational gaps from an Environmental, Health & Safety (EHS) and Social perspective via a questionnaire, which includes EHS & Social related questions. The results are analysed and a summary is provided publicly under the ESG Databook. Refer to: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects of Major Changes to the existing Facility.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects of Major Changes to the existing Facility.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has developed a schedule that prescribes the drills and training planned throughout each year on emergency response. This document also references relevant local procedures for managing each emergency. The Fire Emergency Response Plan has been developed in accordance with local legislation, is reviewed annually and submitted to the local fire department.</p> <p>Although a comprehensive emergency response process and planning exist, these have not been developed in collaboration with Potentially Affected Populations (except the regulator).</p>
2.8a-d Suspended Operations	Minor Non-Conformance	<p>The Entity's Business Continuity Plan (BCP) references Material adverse environmental, social (limited to Health & Safety) and governance impacts. The BCP is reviewed annually by the end of March and addresses both the Copper and Aluminium operations on-site.</p> <p>The BCP however does not include Material adverse impacts related to social aspects other than Health and Safety and potential impacts from Entity closure to Stakeholders have not yet been identified.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity's Investment Project Risk Checklist will identify risks (including EHS & Social) from the Due Diligence process during any merger and/or acquisition activities.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Issues related to Closure, Decommissioning and Divestment are referenced within the BCP. The site is owned by the Entity and routine environmental monitoring (both soil and groundwater) is currently performed to check for contamination and possible legacy issues. The Entity has identified that monitoring will need to be completed again upon exiting the site due to legal requirements.

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's ESG Databook 2024 is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/</p> <p>Contribution from the Entity is considered small compared to the rest of the Kobelco Group; therefore, there is no further breakdown of the Entity's individual contribution for any environmental aspect is currently presented in the report.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity as part of the Kobelco Group has disclosed the history of Bribery and competition law violations on its website under the Ethics and Compliance section at: https://www.kobelco.co.jp/english/about_kobelco/kobesteel/ethics-compliance/index.html</p> <p>Since FY2022, there have been no reported cases of fines or settlements across the Group, which includes the Entity.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented an Anti-Bribery Policy which is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/kobesteel/ethics-compliance/files/anti-bribery_e.pdf</p> <p>Implementation at the Entity includes requiring prior approval for entertainment and gift-giving to government officials and regularly monitoring business expenditures to prevent potential Bribery issues within the Entity.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Complaints Resolution process is provided under page 90 of the ESG Databook, available at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/#esg-databook</p> <p>Complaints can be logged under the publicly available inquiry form at: https://www.kobelco.co.jp/inq/form/index.php?m=Mailform&no=088</p> <p>Interviews undertaken at the Entity during the Audit confirmed a Complaint Log has been developed by the EHS team, with the last complaint filed in 2019 regarding odours lodged by a nearby residential neighbour. An internal investigation and final conclusion by the regulator confirmed that the odour did not emanate from the Entity. No other complaints regarding the environment or Health and safety (H&S) have been received.</p> <p>Although formal communication on the complaint mechanism has not been initiated, the Entity has held personalised discussions with external Stakeholders on how to contact the Entity if required.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>Relevant data from the Entity's production process was submitted to the Japan Aluminum Association, which used these data to develop an accurate LCA of various rolled/extruded Aluminium products, available at: https://www.aluminum.or.jp/environment/pdf/03_2i_p.pdf</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Relevant data from the Entity's production process was submitted to the Japan Aluminum Association, which used these data to develop an accurate LCA of various rolled/extruded Aluminium products, available at: https://www.aluminum.or.jp/environment/pdf/03_2i_p.pdf
4.2 Product Design	Conformance	The Entity considers 'End of Life' when designing products with the Entity's Research and Development (R&D) Department regularly investigating potential options relating to the recyclability of its products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has continually improved the rate of failure, so less Scrap is generated. The Entity's Quality (QA/QC) team holds meetings on a monthly basis to discuss the rate of failure and how to improve this. An internal standard exists for separating the different grades and alloys.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity's 'Technical Roadmap for Developing Alloy 2021 – 2030' is reviewed annually by the Research and Development (R&D) Department and includes all the Aluminium products used on-site. The Roadmap is not specifically shared with the public in full, however, the overall recycling strategy is included under the Kobelco Group Integrated Report 2024, page 42: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity participates in the Aluminum Resource Recycling Research Subcommittee organised by the Japan Aluminum Association (https://www.aluminum.or.jp/english/) which is constantly working on the development of technologies to improve recycling rates and eliminate harmful impurities.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Energy consumption and Greenhouse Gas (GHG) emissions (Scopes 1, 2 and 3) are recorded and published in an ESG Data Book published annually (pages 20–22) which has been independently assured by KPMG at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/files/esg-databook2023_e.pdf#page=20https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/index.html#esg-databook
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 GHG Emissions Reduction Plans	Conformance	The Kobelco Group Integrated Report 2024 (page 15) includes a CO ₂ reduction roadmap aimed at achieving carbon neutrality by 2050. This is available for public review at:

CRITERION	RATING	COMMENT
		https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/index.html#integrated-report
5.3b-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Kobelco Group Integrated Report 2024 (page 15) includes a CO₂ reduction roadmap aimed at achieving carbon neutrality by 2050, available at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/index.html#integrated-report</p> <p>The Report includes progress toward the targets on an annual basis. Whilst Intermediate Targets and a baseline year have been set and publicly disclosed, at the time of the Audit, whilst the Entity had used a SBTi endorsed methodology to develop its emissions reduction pathway, it had not been developed using the ASI Entity GHG Pathways Calculation Tool specifically, and Intermediate Targets covering a period beyond 2030 were not publicly disclosed.</p>
5.4 GHG Emissions Management	Conformance	The Entity is certified to ISO 14001 and the Environmental Management System and Energy Management Regulations (1 April 2021) are established for the entire Kobelco Group and its business entities.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>Emissions from oxides of nitrogen and sulphur (SO_x and NO_x) from all Kobelco Group Entities are disclosed publicly under the Kobelco Group Integrated Report 2024, available at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/</p> <p>No non-compliances related to air emissions at the Entity were identified in 2024. However, formal plans to minimise exposure to, and impacts from Material Emissions to Air have not been developed at the Entity and therefore are not publicly available.</p>
6.2a-g Discharges to Water	Conformance	<p>The Wastewater Treatment Plant (WWTP) at the Entity treats both domestic and process wastewater from all Entities operating within its compound. The most significant contributor to overall volumes is cooling water. Monitoring results of final discharges to the ocean meets local standards to date.</p> <p>No water discharge plan for reduction has been developed specifically for the Entity as the discharge is not considered Material, with most of their discharge comprising cooling water, which contains minimal contaminants.</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	The management of Spills and Leakages are through various Environmental Management System documents; however, these have not been made public as required by ASI.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	There have been no cases of significant Spills in the last two years related to the activities of the Entity. If Spills are to occur, these are disclosed in the Kobelco Group Integrated Report.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity tracks quantities of both Hazardous and Non-Hazardous Waste however, these data have not been publicly disclosed. In addition, a formal Waste management strategy has not yet been developed.

CRITERION	RATING	COMMENT
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity does not store Dross in open and uncovered areas. To prevent its discharge or leachate from entering the environment, Dross is sent to an outsourced external company that recovers the Aluminium and sends the remainder of the Dross to another steel company for re-use in their process. Only small amounts of Dross that cannot be recycled and collected by the dust collector are treated as industrial waste. Landfilling of Dross is not undertaken by the Entity.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water intake volumes from each water source and the discharge volumes by destination are listed on page 32 of the ESG Data Book for the whole of the Kobelco Group, available at: https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/#esg-databook</p> <p>The Entity contributes to these data by internally collecting and reviewing their water intake data and providing data for compilation within the ESG Databook.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risks have been assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity completed a Biodiversity assessment in October 2024 using the Integrated Biodiversity Assessment Tool (IBAT) as the foundation for the desktop assessment. The assessment confirmed that there are no biodiversity conservation sites within the Entity's Area of Influence, nor within three kilometres of the Entity's site boundary.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the Entity's impact is low. The Audit found no evidence that the Entity's impact on Ecosystem Services in its Area of Influence would be Material.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the Entity's impact is low. The Audit found no evidence that the Entity's impact on Ecosystem Services in its Area of Influence would be Material.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined the Entity's impact is low and no Priority Ecosystem Services were identified. The Audit found no evidence that the Entity's impact on Ecosystem Services in its Area of Influence would be Material.
8.4 Alien Species	Conformance	The Entity is in an area allocated to industries by the City Planning Act, and the Entity has determined that the risk to the biodiversity and ecosystems around the factory is small. Wooden pallet materials

CRITERION	RATING	COMMENT
		(wood) used for import and export are fumigated to prevent the introduction and spread of Alien Species.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity’s IBAT assessment confirms that there are no World Heritage sites near the Entity or within a three-kilometre radius of the site. The Entity is in an area allocated to industries by the <i>City Planning Act</i> .
8.6a-d Protected Areas	Conformance	The Entity has undertaken a desktop assessment and confirm that there are no Protected Areas (e.g. Natura 2000) in the area surrounding the Entity, or within its Area of Influence.
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	<p>The Kobe Steel Human Rights Policy to which the Entity subscribes to and implements on-site, is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf</p> <p>The Policy was issued in 2019 and last reviewed in December 2022.</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Group Human Rights Policy includes a policy on gender equality. Refer to: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf</p> <p>The Kobelco Group Integrated Report 2024 includes a discussion on initiatives to promote the advancement of women, including Key Performance Indicators (KPIs) including the female recruitment ratio and the percentage of female managers. The Entity also discloses goals and initiatives to promote women’s empowerment and gender equality publicly at: https://www.kobelco.co.jp/english/about_kobelco/outline/diversity/female-success/index.html</p> <p>This includes initiatives around Work-Life Balance & Human Rights and Labour.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in 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 in 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.

CRITERION	RATING	COMMENT
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 in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	No sacred or cultural heritage sites were identified around the Entity which is located in an area allocated to industries by the <i>City Planning Act</i> . This assessment was completed in conjunction with the IBAT Biodiversity Assessment.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites have been identified within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	Whilst there have been no New Projects or Major Changes initiated at the Entity for several years, the Kobelco Group Basic Policy on Human Rights (https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf) includes Article 9, which states a relationship of trust with the Local Community is built and they will take necessary measures to prevent or mitigate any negative impacts that our business activities may have on the health, land rights, and water access of local residents in the areas where we conduct our business activities.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	The Environmental, Health & Safety team has developed a list of internal and external Stakeholders as part of ISO 14001 requirements and this list also includes Stakeholders relevant to Health & Safety and Social. Although environmental impacts have been identified, there is no specific plan to identify all impacts from the Entity's operations towards Stakeholders from a Health and Safety, social and cultural Human Rights perspective.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity's CSR Procurement Policy includes the prohibition of procuring materials from Conflict-Affected and High-Risk Areas (CAHRAs) and has been integrated into the Entity's procurement practices and Management System. (https://www.kobelco.co.jp/english/sustainability/files/csr-procurement-basic-policy_e.pdf).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Minor Non-Conformance	Although the Entity sources Primary Aluminium from suppliers in South Africa, Australia, New Zealand (majority), India and Malaysia, a risk based Due Diligence in accordance with the OECD Due Diligence Guidance of Minerals from CAHRAs whilst underway, has not yet been completed.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Minor Non-Conformance	Although the Entity sources Primary Aluminium from suppliers in South Africa, Australia, New Zealand (majority), India and Malaysia, a risk based Due Diligence, including the development of strategies in accordance with the OECD Due Diligence Guidance of Minerals from CAHRAs whilst underway, has not yet been completed.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit of the Entity satisfies the requirements of this Criterion.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity's ESG Databook (Section - Building Responsible Supply Chains, page 71) discloses results of the Due Diligence results for the four minerals assessed, which includes gold, tungsten, tantalum and tin, but does not currently disclose the results for Aluminium, as this assessment is yet to be fully completed.
9.9 Security practice	Conformance	The security services at the Entity are outsourced to Shinko Kanmon General Service Co., Ltd. (a Kobelco Group company) and the Kobelco Group Human Rights Policy states that any negative Human Rights impact arising from the Entity's business activities will have appropriate action taken to correct or remedy the situation.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Kobelco Group Basic Policy on Human Rights includes respect for the rights of Workers, Freedom of Association and the right to collective bargaining. This Policy is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf and https://www.kobelco.co.jp/english/sustainability/human_rights.html</p> <p>Kobelco has implemented a Union Shop Agreement and recognises the Kobe Steel Workers' Union as the sole negotiating body within the Entity. The Entity does not have its own Labour Union.</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 to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in Japan.
10.2a-c Child Labour	Conformance	<p>The Group's Human Rights Policy includes a prohibition against child abuse and is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf and https://www.kobelco.co.jp/english/sustainability/human_rights.html</p> <p>The youngest age of employment at Chofu Works is 18 years old.</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Kobelco Group Human Rights Policy includes a prohibition against Forced Labour (Article 1) and is publicly available at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf and https://www.kobelco.co.jp/english/sustainability/human_rights.html</p> <p>Interviews were held with various employees (both men and women), including the Union Leader and no issues were identified with regards to Forced Labour.</p> <p>However, an independent, 'stand-alone' Modern Slavery Statement has not been developed and is not publicly disclosed.</p>
10.4a-c Non-Discrimination	Conformance	<p>Kobelco's Human Rights Policy explicitly prohibits all forms of Discrimination and is published at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf and https://www.kobelco.co.jp/english/sustainability/human_rights.html</p>

CRITERION	RATING	COMMENT
		<p>During the Audit, Worker interviews were held with both newer and longer serving employees, who expressed they were not aware of any Discrimination issues or incidents.</p> <p>Harassment training is conducted, and annually, executives deliver Human Rights messages to promote education on Discrimination prevention and raise awareness of Human Rights.</p>
10.5 Communication and engagement	Conformance	<p>Kobelco's Human Rights Policy includes respect for Freedom of Association and the right to Collective Bargaining and is published at: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf https://www.kobelco.co.jp/english/sustainability/human_rights.html</p> <p>Members from all business Entities within the site participate in the Entity's branch of the Kobelco Labour Union. The Union meets on a half-monthly basis. Reviews of past meeting minutes show no significant outstanding issues to date and interviews with Workers as well as the Union Leader confirmed labour conditions within the Facility are sound, with prompt action taken by the corporate team if any issues are raised.</p>
10.6a-g Violence and Harassment	Conformance	<p>To create a workplace environment free from Harassment, the Group Human Rights Policy, the Code of Conduct for Employees, and the Employee Work Regulations explicitly state that Harassment is not tolerated. Additionally, to ensure that every individual in the workplace understands the issues relating to Harassment and does not ignore issues, the Entity provides regular training through e-learning and in-person seminars: https://www.kobelco.co.jp/english/about_kobelco/csr/files/policy_en.pdf https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports/files/esg-databook2023_e.pdf#page=51</p> <p>There have been no complaints received relating to Violence and Harassment in the past two years and interviews held with various Workers and the Union Leader during the Audit indicate the complaints mechanism is working well, and Workers demonstrated that they were aware of how to lodge a complaint.</p>
10.7a-c Remuneration	Conformance	<p>Article 6 of The KOBELCO Group Basic Policy on Human Rights enforces 'Ensuring Adequate Wages'. In addition, the <i>Employee Wage Regulations 2024</i> specifies under law, the method of wage calculation and payment which is also posted on the Entity's internal intranet for the purposes of informing all Workers.</p>
10.8a-c Working Time	Conformance	<p>On average, each employee at the Entity receives approximately two days off per week, which was evidenced via the Work Schedule per department for 2025. Average working hours per day is seven hours and 45 minutes which are calculated at an average working hour of approximately 7.75 hours using employee ID cards.</p> <p>Interviews with Workers and the Union Leader did not indicate any problems related to Working Time.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Employee Code of Conduct is published on the Entity's internal intranet to raise awareness of employees' rights. Interviews with Workers indicate they are aware of the company policies relating to their Rights.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	Whilst the Entity is not formally certified to a Management System for Occupational Health and Safety (OH&S), an OH&S Manual containing procedures to manage OH&S risks at the Entity has been developed in accordance with the ISO 45001 structure. Periodic meetings are held monthly to discuss OH&S matters between the different levels of employees. No significant OH&S issues were identified from site inspections.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	Although the OH&S Management System is reviewed internally twice a year, the effectiveness of the system is currently not publicly disclosed and whilst the Entity conducts benchmarking exercises with UACJ; the results of this exercise are not publicly disclosed. Thirdly, only a list of significant incidents (Lost Time Injuries (LTI)) for the entire Kobelco Group is currently publicly available in the ESG Databook (page 9) and the Kobelco Group Integrated Report 2024 (page 15) and no other leading or lagging KPI's are publicly disclosed. https://www.kobelco.co.jp/english/about_kobelco/outline/integrated-reports
11.2 Employee engagement on Health and Safety	Conformance	An EHS committee with members from both the Entity and the adjoining Kobelco Copper division has been established. This Committee meets monthly to discuss EHS matters across the combined Plant. Union members are part of this Committee.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 May 2025	Initial Certification Audit – Full Certification