

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Logan Aluminum, Inc.

CERTIFICATE NUMBER  
193

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE  
23 MARCH 2025

DATE OF EXPIRY  
22 MARCH 2028

CERTIFIED SINCE  
23 MARCH 2022

## AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the Aluminium Stewardship Initiative Ltd.

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)*

## CERTIFICATION SCOPE

Remelting, recycling, casting, hot  
mill rolling, cold mill rolling, and coil  
finishing at the Logan Aluminum  
facility in Russellville, KY, USA.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

|                         |   |
|-------------------------|---|
| MEMBER NAME             | Logan Aluminum, Inc.  |
| ENTITY NAME             | Logan Aluminum, Inc.  |
| CERTIFICATION SCOPE     | Remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.   |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul>   |
| ASI STANDARD            | Performance Standard V3.1   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>Initial Certification Audit (7 – 11 February 2022)</li><li>Surveillance Audit (10 – 12 October 2023)</li><li>Re-Certification Audit and Scope Change (10 – 13 March 2025)</li></ul>   |
| AUDIT FIRM              | DNV Business Assurance and Services UK Ltd.   |
| AUDIT DATE              | <ul style="list-style-type: none"><li>7 – 11 February 2022 (Initial Certification Audit)</li><li>10 – 12 October 2023 (Surveillance Audit)</li><li>10 – 13 March 2025 (Re-Certification Audit and Scope Change)</li></ul>   |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>19 February 2022 (Initial Certification Audit)</li><li>15 November 2023 (Surveillance Audit)</li><li>30 April 2025 (Re-Certification Audit and Scope Change)</li></ul>  |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (7 – 11 February 2022)</u></p> <p>The Audit Scope included remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><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><u>Surveillance Audit (10 – 12 October 2023)</u></p> <p>The Audit Scope included remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li></ul> |

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

Re-Certification Audit and Scope Change (10 – 13 March 2025)

The Audit Scope included remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing at the Logan Aluminum facility in Russellville, KY, USA.

Supply chain activities included in the Audit Scope:

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

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

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|---------------|---|
| AUDIT OUTCOME | <ul style="list-style-type: none"><li>• Certification</li></ul> |
|---------------|---|

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|-------------------------------|--|
| AUDIT METHODOLOGY DECLARATION | <p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li>☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li>☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li>☑ 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>☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul> |
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| CERTIFICATION PERIOD | 23 March 2025 – 22 March 2028 |
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| NEXT AUDIT TYPE | Surveillance Audit |
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| NEXT AUDIT DATE | 22 September 2026 |
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|--------------------|-----|
| CERTIFICATE NUMBER | 193 |
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

The Logan Aluminum facility (the ‘Entity’) is located in rural Logan County, Kentucky, USA and commenced operation in 1985, and is a joint venture currently owned by Novelis and Tri-Arrows Aluminum. The facility is situated on a 400 hectare site and produces can stock mainly for the domestic market and includes Remelting, Casting, Hot Rolling, Cold Rolling, and Finishing. The Entity uses primary ingot and secondary recycled inputs to produce over 900,000 tonnes (2 billion pounds (lbs)) of Aluminium annually.

There are over 1,450 employees and contractors working on the site, which also includes maintenance workshops, canteen, medical centre, some recreation areas, administrative offices, laboratory, landfill site, electrical substation, parking lots, wastewater treatment plant, wetland and storage areas.

The Entity’s rural location includes some farming neighbours and small local communities with the nearest town, Lewisburg, approximately three kilometres to the north of the facility. Key stakeholders include various Government and regulatory agencies, the local community, local schools, and employees.

The Entity’s Hot Mill upgrade project and expansion of the high bay storage is currently ongoing.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

|                    | GOVERNANCE | ENVIRONMENT | SOCIAL | COMBINED RATING |
|--------------------|------------|-------------|--------|-----------------|
| <b>SYSTEMS</b>     | High       | High        | Medium | HIGH            |
| <b>RISKS</b>       | High       | High        | Medium | HIGH            |
| <b>PERFORMANCE</b> | High       | High        | High   | HIGH            |
| <b>OVERALL</b>     | HIGH       |             |        |                 |

## FINDINGS

| CRITERION  | RATING      | COMMENT  |
|--|-------------|--|
| 1. BUSINESS INTEGRITY  |             |  |
| 1.1 Legal Compliance   | Conformance | The Entity has established effective systems to ensure ongoing Compliance with legal and regulatory requirements. A dedicated team monitors changes in law through multiple sources, while employees receive regular training on relevant health, safety, and environmental regulations. Non-Compliances are addressed through a formal corrective action process, supported by routine internal audits and performance reviews.   |
| 1.2 Anti-Corruption  | Conformance | The Entity has implemented both a Policy and a robust system for identifying and complying with relevant laws and regulations. The Entity has implemented a Policy related to anti-Corruption and Bribery.   |
| 1.3a-e Code of Conduct   | Conformance | The Entity maintains a Code of Conduct that reflects strong environmental, social, and governance principles. The document is reviewed annually through the Entity's document management system, with the most recent update being completed in July 2024. Both the Employee Code of Conduct and Supplier Code of Conduct are publicly available at:<br><a href="https://www.logan-aluminum.com/resources">https://www.logan-aluminum.com/resources</a>  |
| 2. POLICY AND MANAGEMENT   |             |  |
| 2.1a-f Environmental, Social, and Governance Policy              | Conformance | The Entity has implemented environmental, social, and governance Policies that are reviewed annually, endorsed by senior management, and communicated through formal training and internal systems.  |
| 2.2a-c Leadership  | Conformance | The Entity has appointed senior leadership to oversee the implementation and communication of its ESG Policies and provides resources to support its Management Systems.   |
| 2.3a Environmental and Social Management Systems – Environmental | Conformance | The Entity has implemented integrated Environmental and Social Management Systems, including ISO 45001 and ISO 14001 certification and supporting platforms for training, documentation, and internal reporting.   |
| 2.3b Environmental and Social Management Systems – Social        | Conformance | The Entity has implemented integrated Environmental and Social Management Systems, including ISO 45001 and ISO 14001 certification and supporting platforms for training, documentation, and internal reporting.   |
| 2.4a-e Responsible Sourcing                                      | Conformance | The Entity has implemented and publicly disclosed a responsible sourcing Policy via their Supplier Code of Conduct, which addresses key environmental, social, and governance issues. Ongoing efforts are in place to ensure consistent application across suppliers and improve policy review practices. The Supplier Code of Conduct is available at:<br><a href="https://www.logan-aluminum.com/wp-content/uploads/2022/02/Supplier-Code-of-Conduct-2022.pdf">https://www.logan-aluminum.com/wp-content/uploads/2022/02/Supplier-Code-of-Conduct-2022.pdf</a> |

| CRITERION  | RATING                | COMMENT  |
|--|-----------------------|--|
| 2.5a-g Environmental and Social Impact Assessments | Not Applicable        | This Criterion is not applicable to the Entity, as it has not undertaken any Major Changes requiring a formal Impact Assessment. A documented 'management of change' process is in place to evaluate and manage environmental and social risks associated with operational modifications.  |
| 2.6a-h Human Rights Impact Assessment              | Not Applicable        | This Criterion is not applicable to the Entity, as it has not undertaken any Major Changes requiring a Human Rights Impact Assessment. Human Rights risks are addressed through proactive inclusion efforts, with opportunities identified to enhance ergonomic and workplace assessments in support of gender equity.   |
| 2.7a-f Emergency Response Plan                     | Conformance           | The Entity has implemented a site-specific Emergency Response Plan which is supported through annual training and review processes. The Entity publicly discloses its Spill response procedures at: <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/02/Spill-Prevention-Management-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/02/Spill-Prevention-Management-.pdf</a>  |
| 2.8a-d Suspended Operations                        | Conformance           | The Entity maintains a Business Recovery Plan to manage operational disruptions, with recent updates and demonstrated application in past events such as the COVID-19 pandemic.  |
| 2.9a-b Mergers and Acquisitions                    | Not Applicable        | This Criterion is not applicable to the Entity as it is owned and controlled by a Joint Venture (JV) and as such mergers and acquisitions are controlled by the JV owners.   |
| 2.10a-b Closure, Decommissioning and Divestment    | Conformance           | The Entity has no current plans for closure or divestment. Should future closures or divestments occur, the Entity is expected to review associated risks and develop monitoring and mitigation plans in consultation with affected Stakeholders.  |
| <b>3. TRANSPARENCY</b>                             |                       |  |
| 3.1a-b Sustainability Reporting                    | Minor Non-Conformance | <p>The Entity has disclosed its governance approach and a range of Material sustainability impacts in the Sustainability Report: <a href="https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf</a></p> <p>However, Health and Safety reporting is currently undertaken via the regulator and has not yet been included in the disclosures that are fully accessible to the public.</p>   |
| 3.2 Non-compliance and Liabilities                 | Conformance           | <p>The Entity has internal systems for managing and addressing non-compliance. Liabilities are not disclosed at Entity-level, rather by Joint Venture (JV) owners, Novelis and Tri-Arrows. Tri-Arrows is a privately held company and as such, has a more limited corporate reporting framework.</p> <p>Detailed information on fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law are provided on the EPA Enforcement and Compliance History Only (ECHO) website: <a href="https://echo.epa.gov/detailed-facility-report?fid=110043784982">https://echo.epa.gov/detailed-facility-report?fid=110043784982</a></p> <p>In addition, this information is available on the Occupational Safety and Health Administration's (OSHA) Integrated Management Information System (IMIS):</p> |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | <a href="https://www.osha.gov/ords/imis/establishment.search?p_logger=1&amp;establishment=Logan+Aluminum&amp;State=all&amp;officetype=all&amp;Office=all&amp;sitezip=&amp;p_case=all&amp;p_violations_exist=all&amp;startmonth=12&amp;startday=18&amp;startyear=2018&amp;endmonth=12&amp;endday=18&amp;endyear=2023">https://www.osha.gov/ords/imis/establishment.search?p_logger=1&amp;establishment=Logan+Aluminum&amp;State=all&amp;officetype=all&amp;Office=all&amp;sitezip=&amp;p_case=all&amp;p_violations_exist=all&amp;startmonth=12&amp;startday=18&amp;startyear=2018&amp;endmonth=12&amp;endday=18&amp;endyear=2023</a> |
| 3.3a-c Payments to Governments   | Conformance    | The Entity makes payments to governments solely on a legal or contractual basis and does not make political contributions. Relevant payment information is disclosed through tax and regulatory filings.  |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information                                   | Conformance    | The Entity has implemented a Third Party Complaints Mechanism accessible to internal and external Stakeholders and disclosed through its Code of Conduct. Whilst no complaints have been received to date, the system is reviewed regularly and supported by internal escalation procedures.  |
| 4. MATERIAL STEWARDSHIP  |                |   |
| 4.1a Environmental Life Cycle Assessment   | Conformance    | The Entity has conducted a 'cradle-to-gate' Life Cycle Assessment (LCA) and provides relevant data with customers via its corporate JV owners as part of the LCA's and Product profiles. The Entity contributes to sector-wide LCA's and updates its analysis as Material changes arise.  |
| 4.1b-c Environmental Life Cycle Assessment - Disclosure  | Conformance    | <p>The Entity has conducted a 'cradle-to-gate' LCA and provides relevant data with customers via its Corporate JV owners as part of the LCA's and Product profiles. The Entity contributes to sector-wide LCA's and updates its analysis as Material changes arise.</p> <p>LCA information is not publicly communicated by the Entity, however relevant Product data is shared with downstream customers including its JV owners.</p>   |
| 4.2 Product Design   | Not Applicable | This Criterion is not applicable to the Entity, as it does not participate in end Product design. However, it does contribute to Circular Economy outcomes by supplying Aluminium sheet that is 100% recyclable and widely used in 'closed-loop' applications.  |
| 4.3a-b Aluminium Process Scrap   | Conformance    | The Entity has implemented sound Scrap management systems, targeting 100% recycling and reuse of Aluminium Process Scrap and separating alloy grades in accordance with internal procedures and contractual requirements.   |
| 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 engages with local and national recycling systems to improve Aluminium recovery rates, supporting regional infrastructure development and participating in industry advocacy initiatives.  |
| 5. GREENHOUSE GAS EMISSIONS  |                |   |

| CRITERION   | RATING                | COMMENT   |
|---|-----------------------|---|
| 5.1a-b Disclosure of GHG Emissions and Energy Use                                       | Minor Non-Conformance | <p>The Entity discloses its energy and Greenhouse Gas (GHG) emissions Scope 1 and 2 data in the Sustainability Report.<br/> <a href="https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf</a></p> <p>However, the Entity has not disclosed its Material Scope 3 emissions nor undertaken independent verification of Scope 3 data, with acknowledgement that this is the responsibility of the JV owners.</p>   |
| 5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020          | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020 | Not Applicable        | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.3a GHG Emissions Reduction Plans  | Minor Non-Conformance | <p>The Entity has disclosed a GHG Emissions Reduction Plan and supports broader Group-level targets. The Entity's GHG Emissions Reduction Pathway has been developed using the ASI methodology.</p> <p>However, opportunities exist to quantify the potential GHG emissions reductions associated with site-based decarbonisation plans, to develop time bound site-specific targets, and to further explain how they contribute to the JV owners plans.</p> <p>Details of the Carbon Reduction Strategy and Plan are available at:<br/> <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-GHG-Mgmt.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-GHG-Mgmt.pdf</a><br/> <a href="https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf</a></p> |
| 5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure                   | Conformance           | <p>The Entity has disclosed its GHG Emissions Reduction Plan in the Sustainability Report. The Plan addresses three phases to report on reduction objective goals. The Entity is currently in Phase 1 of the Carbon Reduction Strategy.</p> <p>The Carbon Reduction Strategy and Plan are available at:<br/> <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-GHG-Mgmt.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-GHG-Mgmt.pdf</a><br/> <a href="https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf</a></p>   |
| 5.4 GHG Emissions Management  | Conformance           | The Entity has implemented systems and controls to manage GHG emissions in alignment with its GHG emissions reduction activities.   |
| <b>6. EMISSIONS, EFFLUENTS AND WASTE</b>  |                       |   |
| 6.1a-f Emissions to Air   | Conformance           | The Entity quantifies, manages, and publicly discloses Material Emissions to Air through certified Management Systems and regulatory reporting platforms. The Entity's Air Emissions Management Plan is published on their website at:  |



| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
|   |                | <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/02/Air-Emissions-Management-Plan.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/02/Air-Emissions-Management-Plan.pdf</a>   |
| 6.2a-g Discharges to Water                              | Conformance    | The Entity quantifies and manages Discharges to Water in line with regulatory requirements. The Water Resources Plan is available at: <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-Water-Resources-Plan.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-Water-Resources-Plan.pdf</a>   |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance    | The Entity has implemented and publicly disclosed systems for assessing and managing Spill and Leakage risks, supported by risk assessments, monitoring, and engineering controls. The Spill Prevention Management report is available at: <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/02/Spill-Prevention-Management-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/02/Spill-Prevention-Management-.pdf</a>  |
| 6.4a-b Public Disclosure of Spills and Leakages         | Conformance    | The Entity monitors and discloses Spill information in line with regulatory requirements. No Material Spill events have triggered any additional disclosure obligations.  |
| 6.5a-c Waste Management and Reporting                   | Conformance    | <p>The Entity has implemented systems for Waste management and disclosure that aligns with the requirements of the ASI Performance Standard, including annual Hazardous Waste reporting, quarterly landfill reporting and offsite chemical tracking. The Entity has implemented its Waste Minimisation Plan. Waste data are available at:</p> <p>Sustainability Report: <a href="https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf">https://www.logan-aluminum.com/wp-content/uploads/2024/08/Logan-Aluminum-Sustainability-Report-2023-.pdf</a></p> <p>EPA Toxic Release Inventory: <a href="https://www.epa.gov/toxics-release-inventory-tri-program#trisearch">https://www.epa.gov/toxics-release-inventory-tri-program#trisearch</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    | The Entity has implemented measures to ensure responsible management and to maximise the recycling and recovery of Dross in alignment with the ASI Performance Standard. Dross is shipped to external Dross recyclers and no Dross is sent to landfill.   |
| <b>7. WATER STEWARDSHIP</b>                             |                |   |
| 7.1a-b Water Assessment and Disclosure                  | Conformance    | The Entity has quantified, assessed, and disclosed its water use and water-related risks, and implemented strategies to address potential vulnerabilities in its Area of Influence.   |
| 7.2a-e Water Management                                 | Conformance    | The Entity has implemented and publicly disclosed a Water Resources Plan developed in collaboration with relevant Stakeholders and based on assessed water-related risks: <a href="https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-Water-Resources-Plan.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/03/Logan-Aluminum-Water-Resources-Plan.pdf</a>   |

| CRITERION  | RATING                | COMMENT  |
|--|-----------------------|--|
| <b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>                                  |                       |  |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment            | Conformance           | The Entity has undertaken a systematic assessment of Biodiversity risks and Ecosystem Services. Whilst the overall risk from the Entity's operations is considered low, a Biodiversity Management Plan has been developed with the engagement of relevant Stakeholders.  |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Conformance           | The Entity has undertaken a systematic assessment of Biodiversity risks and Ecosystem Services. Multiple Ecosystem Services have been identified, in particular those that relate to the Entity's operations directly depending upon water supply and flood prevention.  |
| 8.2a-g Biodiversity Management   | Conformance           | Whilst the Entity's risk assessment has determined the potential impacts as low, it has implemented a Biodiversity Management Plan with Stakeholder input, and has publicly disclosed relevant targets and management approaches:<br><a href="https://www.logan-aluminum.com/wp-content/uploads/2025/02/Logan-Aluminum-Biodiversity-Management-Plan-Final.pdf">https://www.logan-aluminum.com/wp-content/uploads/2025/02/Logan-Aluminum-Biodiversity-Management-Plan-Final.pdf</a> |
| 8.3a-c Management of Priority Ecosystem Services                               | Conformance           | The Entity has identified Priority Ecosystem Services and has taken actions to manage impacts in line with ASI Performance Standard requirements.  |
| 8.4 Alien Species  | Conformance           | The Entity has implemented measures to prevent the introduction of Alien Species that could result in Material adverse impacts on Biodiversity and Ecosystem Services.   |
| 8.5a-b Commitment to "No Go" in World Heritage Properties                      | Not Applicable        | This Criterion is not applicable to the Entity, as it does not operate within or adjacent to World Heritage Properties.  |
| 8.6a-d Protected Areas   | Not Applicable        | This Criterion is not applicable to the Entity, as it operates outside the boundaries of designated Protected 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.  |
| <b>9. HUMAN RIGHTS</b>   |                       |  |
| 9.1a-d Human Rights Due Diligence  | Minor Non-Conformance | The Entity has established a general commitment to respecting Human Rights, and has criteria-aligned approaches. The Entity's JV owners are responsible for the Entity's metal procurement.<br><br>However, the Entity has not established a formal Human Rights Due Diligence process or stakeholder mapping.   |
| 9.2a-e Gender Equity and Women's Empowerment                                   | Minor Non-Conformance | The Entity has implemented measures, including an Equal Opportunities Policy and cultural practices to promote gender equity and women's empowerment. The Entity actively engages in outreach activities aimed at encouraging women to pursue careers in manufacturing and engineering.  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | However, at the time of the Audit, there was no public disclosure of the Entity's initiatives and their effectiveness.   |
| 9.3a-i Indigenous Peoples   | Not Applicable | This Criterion is not applicable to the Entity, as its operations are not located on or near the lands or territories of Indigenous Peoples.   |
| 9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes | Not Applicable | This Criterion is not applicable to the Entity, as it does not operate in areas involving Indigenous Peoples where FPIC would be required.   |
| 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 it does not operate in areas involving Indigenous Peoples where FPIC would be required.   |
| 9.5a Cultural and Sacred Heritage - Identification                            | Not Applicable | This Criterion is not applicable to the Entity, as its Entity's Area of Influence does not contain any identified cultural or sacred heritage sites of Indigenous Peoples.           |
| 9.5b Cultural and Sacred Heritage - Impacts                                   | Not Applicable | This Criterion is Not Applicable as the Entity's Area of Influence does not contain any identified cultural or sacred heritage sites of Indigenous Peoples.                          |
| 9.6a-i Displacement   | Not Applicable | This Criterion is not applicable to the Entity, as it has not initiated any New Projects or Major Changes since joining ASI that would trigger requirements related to displacement. |
| 9.7a-h Affected Populations and Organisations                                 | Conformance    | The Entity demonstrates respect for the rights and interests of Affected Populations and Organisations and evidence demonstrated how it supports Local Community development.        |
| 9.8a Conflict-Affected and High-Risk Areas - Strong management systems        | Not Applicable | This Criterion is not applicable to the Entity, as it does not source any Primary Aluminium.   |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks        | Not Applicable | This Criterion is not applicable to the Entity, as it does not source any Primary Aluminium.   |
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks     | Not Applicable | This Criterion is not applicable to the Entity, as it does not source any Primary Aluminium.   |
| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence           | Not Applicable | This Criterion is not applicable to the Entity, as it does not source any Primary Aluminium.   |

| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
| 9.8e Conflict-Affected and High-Risk Areas - Report annually   | Not Applicable        | This Criterion is not applicable to the Entity, as it does not source any Primary Aluminium.  |
| 9.9 Security practice  | Conformance           | The Entity demonstrates alignment with recognised standards and good practices in its approach to security, with procedures in place to uphold Human Rights.  |
| <b>10. LABOUR RIGHTS</b>   |                       |   |
| 10.1a-c Freedom of Association and Right to Collective Bargaining  | Conformance           | The Entity respects Workers' rights to Freedom of Association and Collective Bargaining, with no restrictions in place and systems that support open communication and Worker engagement.   |
| 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 it allows Freedom of Association and Collective Bargaining consistent with Federal and State law.  |
| 10.2a-c Child Labour   | Conformance           | The Entity does not employ individuals under the age of 18 years and has controls in place to ensure compliance with Child Labour standards, including safeguards for supervised youth engagement programs.   |
| 10.3a-c Forced Labour  | Minor Non-Conformance | <p>The Entity has systems in place to prevent Forced Labour and ensure ethical employment practices. The Entity's JV owners are responsible for metal inputs, and Novelis has disclosed a Modern Slavery Statement.</p> <p>However, the Entity has not prepared its own 'stand-alone' Modern Slavery Statement.</p> |
| 10.4a-c Non-Discrimination   | Conformance           | The Entity promotes non-Discrimination through structured hiring, compensation, and advancement processes, supported by Policy, training, and equitable review mechanisms.  |
| 10.5 Communication and engagement  | Conformance           | The Entity maintains structured and open channels for Worker engagement, including team representatives and regular meetings, ensuring that workplace concerns can be raised without fear of reprisal.  |
| 10.6a-g Violence and Harassment  | Conformance           | The Entity maintains a Workplace Harassment Policy supported by annual reviews, training, and internal reporting mechanisms. The Code of Conduct, which reinforces these principles, is available at: <a href="https://www.logan-aluminum.com/resources">https://www.logan-aluminum.com/resources</a>               |
| 10.7a-c Remuneration   | Conformance           | The Entity ensures fair remuneration practices that exceed legal requirements and incorporate mechanisms for transparency, scheduling flexibility, and employee development.  |
| 10.8a-c Working Time   | Conformance           | The Entity manages Working Time in accordance with legal requirements and industry standards, offering schedule flexibility and safeguards against excessive hours.   |

| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
| 10.9a-b Informing Workers of Rights  | Conformance           | The Entity informs Workers of their rights as protected under both Applicable Law and the ASI Performance Standard.   |
| <b>11. OCCUPATIONAL HEALTH AND SAFETY</b>  |                       |   |
| 11.1a Occupational Health and Safety (OH&S) Management System                            | Conformance           | The Entity maintains a certified Occupational Health and Safety (OH&S) Management System with appropriate internal reporting and engagement functions. The Entity is certified to ISO 45001.  |
| 11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure | Minor Non-Conformance | The Entity maintains a certified OH&S Management System with appropriate internal reporting and engagement functions.<br><br>However, the Entity has not yet published external reporting of lagging indicators and comparative benchmarking. |
| 11.2 Employee engagement on Health and Safety  | Conformance           | The Entity has implemented multiple channels for Worker participation in Health and Safety decision-making.   |

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE            | NOTES   |
|----------|-----------------|---|
| 0        | 23 March 2022   | Initial Certification Audit – Full Certification  |
| 1        | 18 January 2023 | Surveillance Audit  |
| 2        | 19 June 2025    | Re-Certification Audit and Scope Change – Full Certification<br>Scope Change to apply PS V3.1 |