

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Gränges Konin SA

CERTIFICATE NUMBER  
**314**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

DATE OF ISSUE  
**11 OCTOBER 2023**

CERTIFICATION  
LEVEL  
**FULL  
CERTIFICATION**

DATE OF EXPIRY  
**10 OCTOBER 2026**

ASI ACCREDITED  
AUDITING FIRM  
**TÜV RHEINLAND  
CERT GMBH**

CERTIFIED SINCE  
**11 OCTOBER 2023**

## AUTHORISED BY

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

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

## CERTIFICATION SCOPE

The design and manufacture of  
rolled Aluminium strips and sheets  
at the Gränges facility located in  
Konin, Poland.

# AUDIT REPORT

# PERFORMANCE

# STANDARD

## OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Gränges Konin SA
CERTIFICATION SCOPE	The design and manufacture of rolled Aluminium strips and sheets at the Gränges facility located in Konin, Poland.
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	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (21 – 22 February 2023)</li><li>Surveillance Audit (12 – 16 May 2025)</li></ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>21 – 22 February 2023 (Initial Certification Audit)</li><li>12 – 16 May 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>1 August 2023 (Initial Certification Audit)</li><li>11 June 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 22 February 2023)</u></p> <p>The Audit Scope included the design and manufacture of rolled Aluminium strips and sheets at the Gränges facility located in Konin, Poland.</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 (12 – 16 May 2025)</u></p> <p>The Audit Scope included the design and manufacture of rolled Aluminium strips and sheets at the Gränges facility located in Konin, Poland.</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>

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**AUDIT OUTCOME**

- Certification

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**AUDIT METHODOLOGY  
DECLARATION**

The Auditors confirm that:

- ✓ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ✓ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ✓ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ✓ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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**CERTIFICATION PERIOD**

11 October 2023 – 10 October 2026

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**NEXT AUDIT TYPE**

Re-Certification Audit

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**NEXT AUDIT DATE**

10 October 2026

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**CERTIFICATE NUMBER**

314



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 Gränges Konin S.A facility (the 'Entity') has been in operation for over 50 years with production commencing in 1966 with both primary smelting and rolling operations as a State-owned enterprise. The Entity, which currently employs over 700 personnel, was privatised in 1995 and in 2008 it was merged with Impexmetal. The primary smelter was closed in 2009 due to high energy prices, but the Aluminium rolling mill continued operations. In 2020, Gränges AB. acquired the rolling mill and remelting Facility.

In 2021 and 2022, additional investments have been conducted in the factory by adding additional Casting capacity, an additional cold rolling mill as well as annealing furnaces and a new thick gauge slitter. Capacity has been increased from 100,000 tonnes to 140,000 tonnes by these investments. The majority of the Entity's Products are used in the automotive, packaging, electrical engineering, and construction industries.

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has identified legal requirements relevant to its scope of business operations and has established a structured approach to ensure ongoing compliance. Designated personnel are responsible for monitoring changes in both local and international legislation. Specialists assigned to specific business areas actively track regulatory developments and initiate updates to internal processes and procedures as needed. Interviews conducted during the assessment confirmed that all managers and Workers demonstrated the competence to understand legal obligations and act accordingly.</p> <p>Furthermore, the Entity has demonstrated an understanding of relevant aspects of Customary Law and has taken appropriate steps to align its practices where applicable. In cases where a conflict arises between Customary Law and Applicable Law, the Entity has confirmed that it prioritises Compliance with Applicable Law.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established adequate Anti-Corruption measures, including Policies, training, Due Diligence assessments and a 'whistleblowing' reporting hotline and procedure, which is endorsed by senior management. The Entity undertakes regular internal audits of its Anti-Corruption Management System, and employee training compliance is regularly monitored.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed and implemented a Code of Conduct that outlines the principles of responsible business conduct. These principles include, but are not limited to, the prevention of Corruption and Bribery, avoidance of conflicts of interest, environmental protection, and respect for Human Rights, as defined by the UN Guiding Principles on Business and Human Rights and the core conventions of the International Labour Organization (ILO).</p> <p>A Code of Conduct has been formally endorsed by senior management and is publicly available in the local language. It is presented to all new employees during the onboarding process. During Audit interviews, it was confirmed that personnel are aware of and understand the ethical standards set by the Entity.</p> <p>The most recent version of the Code of Conduct was issued in 2024 and is available at (English version):  <a href="https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/coc_24/coc_2024_english.pdf">https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/coc_24/coc_2024_english.pdf</a> </p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity adheres to corporate standards and has implemented Policies consistent with the Environmental, Social and Governance (ESG) practices included in this Standard. The Facility is regularly audited against the ISO 14001:2015 Management System standard.</p> <p>The Entity has demonstrated senior management endorsement for its Environmental, Health &amp; Safety and Employee Policies and has allocated resources to implement the Policies. Further information about the Entity's environmental and social goals and strategy are disclosed in their 2024 Annual and Sustainability Report</p>

CRITERION	RATING	COMMENT
		<p>from page 14 onwards: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>The Entity's Policies related to ESG aspects are communicated externally through its corporate website at: <a href="https://www.granges.com/sustainability/governance-and-policies/policies/">https://www.granges.com/sustainability/governance-and-policies/policies/</a></p>
2.2a-c Leadership	Conformance	The Entity's management has declared its full support for the implementation of the Integrated Management System. It has developed an organisational structure with specialist personnel responsible for production and non-production aspects of business operations. The Entity has appointed a representative, who is enabled to manage the Integrated Management System aimed to meet the requirement of this standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established an Integrated Management System (IMS). In accordance with ISO 9001 and ISO 14001, refer to: <a href="https://www.granges.com/sustainability/certifications/">https://www.granges.com/sustainability/certifications/</a>
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an Integrated Management System to provide compliance within the scope of social aspects, including Human Rights in the workplace and based on the local law and the ASI Performance Standard. Adequate processes, Policies, procedures and personnel are in place.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established procedures to monitor risks in the supply chain. There is a process of risk desktop screening and suppliers are obliged to recognise the Entity's Supplier Code of Conduct. The process is managed and coordinated by the parent Entity, which is responsible for the assurance of the sustainable value chain.</p> <p>The Responsible Sourcing Policy and Supplier Code of Conduct are both available at: <a href="https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/sustainability-policies-2024/gp2.11-supplier-code-of-conduct-2024-02-22.pdf">https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/sustainability-policies-2024/gp2.11-supplier-code-of-conduct-2024-02-22.pdf</a> and <a href="https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/sustainability-policies-2024/gp2.10-global-responsible-sourcing-policy-2024-02-22.pdf">https://www.granges.com/globalassets/04.-hallbarhet/02.-strategy-and-governance/08.-policies/sustainability-policies-2024/gp2.10-global-responsible-sourcing-policy-2024-02-22.pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as it has not recently implemented a New Project or Major Change, which would require a related Impact Assessment. However, the Entity has a process in place that covers the requirements of the Standard related to Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as it has not recently implemented a New Project or Major Change, which would require a related Human Rights Impact Assessment. However, the Entity has a process in place that covers the requirements of the Standard related to Environmental and Social Impact Assessments.
2.7a-f Emergency Response Plan	Conformance	As confirmed through document review and Audit interviews, the Entity has site-specific Emergency Response Plans (ERP) in place. The master Emergency Response Plan is available to relevant Stakeholders upon request.

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has developed plans to address risk and Force Majeure situations. Financial and organisational resources were assured to address risks such as lack of Workers during the COVID-19 pandemic. No evidence of suspension of activities in the last 12 months was identified.
2.9a-b Mergers and Acquisitions	Conformance	The Entity confirms that there has been no merger or acquisition activity involving the Entity during the period since the previous Audit.  The Entity's parent Group reviews environmental, social, and governance (ESG) issues in the Due Diligence process for all investment requests to support capital allocation, adheres to regulatory reporting requirements, and assesses alignment with the Entity's sustainability ambitions. This process is applicable to any potential merger or acquisition.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity confirms that there have been no closure, decommissioning, or divestment activity involving the Entity during the period since the previous Audit.  The Entity's parent Group reviews environmental, social, and governance (ESG) issues in the Due Diligence process for all investment requests to support capital allocation, adheres to regulatory reporting requirements, and assesses alignment with the Entity's sustainability ambitions. This process is applicable to any closures, decommissioning, or divestment activity.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has implemented a process to collect data and report in accordance with the Global Reporting (GRI) Guidelines and EU Taxonomy Regulation. The Entity's latest Annual and Sustainability Report 2024 is publicly available at: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has established processes for assurance compliance with local law. No evidence of fines, judgments, penalties and non-monetary sanctions was found. The status of the Entity can be verified in the National Court Register under No 0000003679 (refer to: <a href="https://wyszukiwarka-krs.ms.gov.pl/">https://wyszukiwarka-krs.ms.gov.pl/</a> ).  The Entity publishes information on any received fines for violation of anti-Corruption and anti-Bribery laws, or other transgressions in the Annual and Sustainability Report 2024, page 156: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>
3.3a-c Payments to Governments	Conformance	The Entity is subject to third party independent audits by local accountants on an annual basis which includes a review of payments to Governments. The Entity demonstrated compliance with local laws and regulations. The Entity's Anti-Corruption Policies and instructions on facilitation of payments govern its compliance and Due Diligence assessments to ensure all payments are made on a legal/contractual basis.
3.4a-f Stakeholder Complaints, Grievances	Conformance	The Entity has established a procedure to allow Stakeholders to report any grievances. There is a third-party whistle-blower agent who

CRITERION	RATING	COMMENT
and Requests for Information		operates a Grievance Mechanism accessible online at: <a href="https://granges.trumpet-whistleblowing.eu/">https://granges.trumpet-whistleblowing.eu/</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated its life cycle impacts of its major Product lines, which is available at: <a href="https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/ivl-verification-raport-of-granges-konin-cf-calculation-model.pdf">https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/ivl-verification-raport-of-granges-konin-cf-calculation-model.pdf</a> and <a href="https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/210209_granges-konin-carbon-footprint-report-2022-review.pdf">https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/210209_granges-konin-carbon-footprint-report-2022-review.pdf</a></p> <p>Additionally, The Entity has calculated the carbon footprint indicator for each manufactured Product. An analysis of additional categories of environmental impacts can be found in Environmental Product Declaration No. 606/2024, available at: <a href="https://www.itb.pl/wp-content/uploads/2024/11/ITB-EPD_606_GRANGES-KONIN-SA-Aluminium-slabs-plates-sheets-strips-and-profiles_v2.pdf">https://www.itb.pl/wp-content/uploads/2024/11/ITB-EPD_606_GRANGES-KONIN-SA-Aluminium-slabs-plates-sheets-strips-and-profiles_v2.pdf</a></p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>Life Cycle Assessment (LCA) information is available for customers on request and on the Entity's webpage. The Entity has evaluated its life cycle impacts of its major Product lines, which is available at: <a href="https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/ivl-verification-raport-of-granges-konin-cf-calculation-model.pdf">https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/ivl-verification-raport-of-granges-konin-cf-calculation-model.pdf</a> and <a href="https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/210209_granges-konin-carbon-footprint-report-2022-review.pdf">https://www.granges.com/globalassets/04.-hallbarhet/03.-strategic-focus-areas/03.-customers-and-sectors/210209_granges-konin-carbon-footprint-report-2022-review.pdf</a></p> <p>Additionally, the Entity has calculated the carbon footprint indicator for each manufactured Product. An analysis of additional categories of environmental impacts can be found in Environmental Product Declaration No. 606/2024, available at: <a href="https://www.itb.pl/wp-content/uploads/2024/11/ITB-EPD_606_GRANGES-KONIN-SA-Aluminium-slabs-plates-sheets-strips-and-profiles_v2.pdf">https://www.itb.pl/wp-content/uploads/2024/11/ITB-EPD_606_GRANGES-KONIN-SA-Aluminium-slabs-plates-sheets-strips-and-profiles_v2.pdf</a></p>
4.2 Product Design	Conformance	<p>The Entity has implemented a strategy to increase sustainable Product offerings through product life cycle improvement, through Circular Economy models with customers, and joint innovation and collaboration to develop low-carbon and sustainable alloys. Further information on the Entity's strategy to provide sustainable product offerings is available in the Annual and Sustainability Report 2024, page 151: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established daily monitoring and controls to minimise the amount of Scrap generated internally. The Entity has defined Scrap collection and recycling mechanisms based on the properties of the Scrap produced. The Entity has developed a 'Technical Data Sheet – Alloy 4115', which facilitates a significant improvement of Scrap usage on site.</p>
4.4a-c Collection and Recycling of Products at End of Life – Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
Conversion and other Manufacturing		
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has established clear targets to increase the recycled content in its final products. In 2024, the share of externally sourced Recycled Aluminium used in production reached 58 percent versus a Group-wide usage percentage of 46.2%. This strong performance was driven by strong recycling efforts, supported by strategic partnerships, investments in recycling capacity, and product innovation.</p> <p>Additionally, the total weight of recycled components, secondary intermediary products, and secondary materials used in manufacturing does not include packaging. The reported recycled content rate reflects only the externally sourced Recycled Aluminium incorporated into the Entity's products. Further information is available in the Annual and Sustainability Report 2024, page 152:  <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity's Scope 1, 2 and 3 emissions are accounted for on an annual basis for all production facilities and are publicly disclosed on page 137 in the Entity's 2024 Annual and Sustainability Report. Types of energy sources used by the production facilities are disclosed on page 133 of the Report. All emissions data are Third Party verified.</p> <p>The Annual and Sustainability Report 2024 is accessible at:  <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>The Entity holds valid ISO 14001 and ISO 50001 certificates for environmental and energy Management Systems.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Group has published its Greenhouse Gas (GHG) Emissions Reduction Plan, outlining its strategic approach to reducing emissions across all scopes. The plan is publicly available in the Annual and Sustainability Report 2024, specifically on pages 133–134 and 136–137:  <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>A detailed GHG Emissions Reduction Pathway has also been developed and is accessible on the Group's sustainability webpage:  <a href="https://www.granges.com/sustainability/net-zero-plan/">https://www.granges.com/sustainability/net-zero-plan/</a></p> <p>Based on this framework, the Entity has set long-term sustainability goals for 2030, including the reduction of CO<sub>2</sub> emission intensity (Scope 1, 2 and 3) from 6.0 tCO<sub>2</sub>e/t in 2020 to below 4.0 tCO<sub>2</sub>e/t by 2030. The GHG reduction plan has been established in alignment with a 1.5°C Warming Scenario, using the methodology approved by ASI.</p>

CRITERION	RATING	COMMENT
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Group has published its Greenhouse Gas (GHG) Emissions Reduction Plan, outlining its strategic approach to reducing emissions across all scopes. The plan is publicly available in the Annual and Sustainability Report 2024, specifically on pages 133–134 and 136–137: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>A detailed GHG Emissions Reduction Pathway has also been developed and is accessible on the Group's sustainability webpage: <a href="https://www.granges.com/sustainability/net-zero-plan/">https://www.granges.com/sustainability/net-zero-plan/</a></p> <p>Based on this framework, the Entity has set long-term sustainability goals for 2030, including the reduction of CO<sub>2</sub> emissions intensity (Scopes 1, 2 and 3) from 6.0 tCO<sub>2</sub>e/t in 2020 to below 4.0 tCO<sub>2</sub>e/t by 2030. The GHG reduction plan has been established in alignment with a 1.5°C Warming Scenario, using the methodology approved by ASI.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity works systematically to achieve performance aligned to the GHG Emissions Reduction Plan and targets. The main directions of the strategy are related to the modification of alloys' chemical composition to increase recycling levels, a closed loop recycling system, strong cooperation with customers, recycling of both post-produced and Post-Consumer Scrap and establishing strategic partnerships to secure long term access to Recycled Aluminium, Pre-Consumer Scrap and 'end-of-life' Scrap.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has established systems and procedures to monitor and report Emissions to Air in accordance with national regulatory requirements. These include structured reporting to national authorities and internal monitoring processes to ensure compliance and environmental responsibility.</p> <p>In addition to carbon dioxide equivalent (CO<sub>2</sub>eq) emissions, the Entity also discloses data on other air emissions. This information is available in the Annual and Sustainability Report 2024, page 147: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>The report presents environmental performance data for both the Group and the Entity, offering a comprehensive view of emissions management practices.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has disclosed its water consumption and discharge data in the Annual and Sustainability Report 2024, pages 148–149: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p> <p>The Report includes information for both the Group and the Entity. The Entity does not discharge directly into water bodies. Additionally, the Entity reports its environmental resource usage, including water management, to local authorities in accordance with applicable regulations.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that relate to the detection, assessment and management of Spills and Leakages. During the Audit, controls were reviewed to prevent contamination of air, soil and water due to major Spills and Leakages. No major Spills or incidents have been reported since the Entity joined ASI.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has provided information on any Spills and environmental incidents in the Annual and Sustainability Report 2024, page 147: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>  The Report includes data for both the Group and the Entity.
6.5a-c Waste Management and Reporting	Conformance	Within the framework of its Environmental Management System, the Entity has developed a waste management plan and identified key waste streams generated during production, including used chemicals, wood and filter cake. The type and quantity of disposed waste are disclosed in the Annual and Sustainability Report 2024, pages 150–153: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>  The Report includes information for both the Group and the Entity.
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 works to minimise the Aluminium content in Dross. The Dross is stored within an undercover area, or in closed containers to prevent any release into the environment. All Dross is sent to an external recycling facility.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and mapped all water consumption on site via its water intake risk assessment. The Entity's water withdrawal, return and consumption have been made publicly available in the Sustainability Report 2022, pages 39 and 129: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>
7.2a-e Water Management	Conformance	The Entity has established operational controls and an environmental monitoring plan. The governance of the Water Stewardship Plan was well defined, with relevant experts from the environmental, as well as external communications functions. The progress of the Water Management Plan is regularly reviewed via the Entity's annual management reviews.  The Entity's water management approach as well as performance against established targets is available in the Sustainability Report 2022, pages 39 and 129: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	As part of the 2011, 2013–2015 and 2018–2019 permitting process, a biodiversity risk assessment has been undertaken by the Entity. The biodiversity assessment which was conducted by a competent third party concluded that there were no Material impacts on biodiversity as a result of the Entity's activities. This report was shared with the local authorities.
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity as the biodiversity assessment determined the Entity's impact as low. There was no

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		observation made during the audit 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 as low.
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 as low.
8.4 Alien Species	Conformance	The biodiversity assessment conducted as a part of the IPPC application process, did not recommend any action related to invasive species. There is a very low risk of accidental or deliberate introduction of Alien Species.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity does not operate in, nor plan to explore or develop New Projects in or close to World Heritage Properties. The Entity's production site is not adjacent to a World Heritage Property.
8.6a-d Protected Areas	Conformance	The Entity does not operate in, nor plan to explore or develop New Projects in or close to Protected Areas. The nearest protected landscape area is over one kilometre from the Entity and outside the Entity's 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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a Human Rights Due Diligence system. It is based on the Entity's Code of Conduct, which refers to the UN Guiding Principles and the Entity's approach to Human Rights. The Entity provides specific training to increase Workers' and Managers' awareness on Human Rights in the workplace. Audit interviews confirmed that Human Rights in the workplace are protected, and people are treated with respect and dignity.</p> <p>Human Rights are specifically referenced in the Entity's Code of Conduct. The Entity acknowledges that Human Rights risks are present in the supply chain, and therefore Human Rights requirements are included in the Supplier Code of Conduct, available at: <a href="https://www.granges.com/sustainability/governance-and-policies/policies/">https://www.granges.com/sustainability/governance-and-policies/policies/</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has recognised diversity and inclusion principles as critical to its culture and employment strategy. The Entity subsidises educational programs to empower Workers of both genders to be promoted, however, there have been targets set to include more women in managerial positions. Maternity and paternal rights are protected, and women are provided with maternity and paternal leave as per local legislation. The promotion of Gender Equity within the Entity is included in the Entity's Code of Conduct. The effectiveness of the measures taken to promote gender equity on an annual basis

CRITERION	RATING	COMMENT
		is made publicly available in the Annual and Sustainability Report 2024, pages 155–157: <a href="https://storage.mfn.se/48ccc9d3-67b1-4ce5-a6f8-1f60ebffaf98/granges-annual-and-sustainability-report-2024.pdf">https://storage.mfn.se/48ccc9d3-67b1-4ce5-a6f8-1f60ebffaf98/granges-annual-and-sustainability-report-2024.pdf</a>
9.3a-I Indigenous Peoples	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC)– New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
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, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage– Identification	Not Applicable	This Criterion is not applicable, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage– Impacts	Not Applicable	This Criterion is not applicable, as no sacred or cultural heritage sites and values within the Entity's 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, as the Entity did not require people to resettle/to be displaced. This was confirmed via interviews undertaken during the audit. The Entity's senior management confirmed that any displacement is not planned for New Projects or Major Changes.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has developed supporting programs for the Local Community to assist vulnerable individuals. There is cooperation with the local orphanage and a social support institution. As part of these efforts, the Entity also engages in initiatives such as 'Run for Europe', Occupational Health and Safety Week, management visits to local kindergartens to present the nature of industrial work, and celebrations of International Women's Day.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Supplier Code of Conduct and supplier risk assessments to ensure it is not sourcing materials from Conflict-Affected or High-Risk Areas. The Entity has implemented a Supply Chain Due Diligence Programme to further manage risk from the supply chain related to areas of armed conflict or Human Rights abuses, in accordance with the OECD Due Diligence Guidance. The Entity has a strong Management System in place in relation to responsible sourcing led by procurement, with clear roles and responsibilities, supplier screening, risk assessment and escalation processes. Refer to: <a href="https://www.granges.com/globalassets/04-hallbarhet/02-strategy-and-governance/08-policies/sustainability-">https://www.granges.com/globalassets/04-hallbarhet/02-strategy-and-governance/08-policies/sustainability-</a>

CRITERION	RATING	COMMENT
		<a href="#"><u>policies-2024/gp2.10-global-responsible-sourcing-policy-2024-02-22.pdf</u></a>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has implemented a risk assessment process to assess potential risks for Human Rights in conflict-affected areas.</p> <p><a href="https://www.granges.com/sustainability/focus-areas/sustainable-supply-and-recycling/"><u>https://www.granges.com/sustainability/focus-areas/sustainable-supply-and-recycling/</u></a></p> <p>There is no evidence of supporting armed conflict in the neighbouring state (Ukraine) was identified.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has implemented a Management System in relation to responsible sourcing led by procurement, with clear Policies and strategies for risk management. The supplier risk-based Due Diligence is based on a strategy to ensure 100% Suppliers with responsible sourcing practices. The supplier Due Diligence process has been strengthened, meaning more suppliers are subject to screening and the mitigation/corrective action process. The Responsible Sourcing Policy outlines the risk criteria and matrix.</p> <p>The Entity has implemented a risk assessment process to assess potential risks for Human Rights in conflict areas, available at: <a href="https://www.granges.com/sustainability/focus-areas/sustainable-supply-and-recycling/"><u>https://www.granges.com/sustainability/focus-areas/sustainable-supply-and-recycling/</u></a></p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>Appropriate to its size and circumstances, the Entity has developed a ‘risk scanning’ (auditing) procedure which is coordinated by the responsible manager in the parent Entity, which relates to the assessment of the Entity’s supply chains.</p> <p>Additionally, this Audit satisfies the requirements of this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Group, including the Entity, reports supply chain risks on an annual basis in the Annual and Sustainability Report 2024, available at: <a href="https://www.granges.com/investors/reports-and-presentations/"><u>https://www.granges.com/investors/reports-and-presentations/</u></a></p>
9.9 Security practice	Conformance	<p>The Entity employs security Workers only for the purpose of security monitoring of the plant. Security guards do not perform body searches nor carry weapons. If required, security guards can engage the local police to perform an investigation.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity allows Workers to freely associate and negotiate Collective Bargaining agreements. There are two Trade Unions on site which engage most of the Entity’s plant employees. The last changes in the freely negotiated Collective Bargaining Agreement were implemented in March 2023.</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining are not restricted in the country (Poland) where the Entity operates and is located.</p>
10.2a Child Labour	Conformance	<p>The Entity has declared in its Code of Conduct to only employ Workers who are at least 15 years of age or the applicable minimum legal age,</p>

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		whichever is higher. It has declared to protect young Workers, who are between 15 and 18, by limiting their schedules and tasks including heavy work, hazardous work and night shifts. Occupational hazards are assessed and documented. The Entity's Human Resources function verifies the age of each Worker through a review of identification documents as well as copies of school and professional certificates. Vocational students (apprentices) work under the supervision of trained senior Workers, who are responsible for coaching and safety of these young people.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has declared in its Code of Conduct that it will not tolerate any form of Forced Labour. The employment process, from recruitment to termination of employment, is free from indicators of Forced Labour. The Entity has embedded Human Resources practices to ensure it upholds these expectations and is compliant with Polish law.</p> <p>Whilst no actual risks have been identified and existing Policies are in place, there is currently no publicly available Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has declared to prevent Discrimination and implemented recruitment and employment procedures to assure equal treatment in recruitment, employment, Remuneration and access to training.
10.5 Communication and engagement	Conformance	The Entity has established a communication process aimed at informing Workers about their Rights and obligations and about the Entity's legal and financial situation. Regular meetings with Worker representatives are a form of effective dialogue in the workplace. There is a Worker satisfaction survey tool used to anonymously collect Workers' feedback. Daily communication is supported by intranet, email, information boards and bulletin.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented clear disciplinary procedures to ensure a safe, respectful, and Harassment-free work environment. In line with the Code of Conduct, misconduct such as being under the influence of alcohol or drugs may lead to disciplinary action, including termination. All measures comply with local labour law and are applied transparently, with union consultation in cases of dismissal. These commitments are outlined in Section 2.1 of the Code of Conduct and detailed in the Work Regulations.</p> <p>The Code of Conduct is available at:  <a href="https://www.granges.com/sustainability/governance-and-policies/policies/">https://www.granges.com/sustainability/governance-and-policies/policies/</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity has freely negotiated a Collective Bargaining Agreement, which forms the basis for monthly Remuneration. Wages are paid monthly, and employees have access to detailed payment information. All employees receive a written description of their employment conditions through contracts and individual job descriptions, provided in Polish.</p> <p>New employees are offered a starting wage at least 10% higher than the national minimum wage, as prescribed in the Entity's Collective Labour Agreement. Overtime is compensated in accordance with applicable labour laws, and salaries are paid on time. No Migrant Workers are employed at the Entity.</p>

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		The Entity ensures that wages meet the criteria of a living wage, based on the Anker Methodology. Estimates indicate that a living wage in Poland typically exceeds the national minimum by 20–30%. The Entity's wage practices are aligned with this standard.
10.8a–c Working Time	Conformance	The Entity has implemented a production process that is planned based on the availability of Workers and the number of Workers on site. Working hours are not excessive, and on average, no more than eight hours a day and 40 hours a week. Overtime work is considered an atypical occurrence at the Entity.
10.9a–b Informing Workers of Rights	Conformance	<p>The Entity has established a process to inform Workers on their rights and obligations. Every Worker is informed in writing of the terms and conditions of their employment as well as potential risks in their workstations, the scope of use of their personal data and equal treatment in the workplace, as per local labour law requirements. The onboarding process is aimed at ensuring that Workers are well informed about their rights and obligations.</p> <p>The Entity ensures all Workers are informed, trained, and protected through structured onboarding, ethics and safety training, and compliance with labour laws and workplace standards.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has issued and internally communicated its Integrated System Policy including the Occupational Health and Safety (OH&amp;S) Policy. The Entity has implemented an active OH&amp;S Management System, as confirmed by site tours, interviews and document review. Audits and management reviews have been demonstrated. The Entity places strong emphasis on Health and Safety standards for Contractors.</p> <p>During the Audit, a non-conformance was identified relating to fall protection requirements that were not utilised for high-risk work performed at great heights.</p>
11.1b–e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	<p>The Entity has established a structured process for reviewing its OH&amp;S Management System. This includes the regular conduct of internal audits and formal management reviews to ensure continuous improvement and compliance with applicable standards.</p> <p>A description of the effectiveness of the OH&amp;S Management System has been made publicly available on the Entity's website. In addition, detailed Key Performance Indicators (KPIs) related to OH&amp;S performance are disclosed in the Annual and Sustainability Report 2024, page 160: <a href="https://www.granges.com/investors/reports-and-presentations/">https://www.granges.com/investors/reports-and-presentations/</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has mechanisms in place to discuss Occupational Health and Safety issues with management and Workers such as meetings between Worker Representatives and a joint Health and Safety Committee.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 October 2023	Certification Audit – Full Certification
1	14 July 2025	Surveillance Audit Correction to the conformance rating for Criteria 2.5a-e and 2.6 a-e.