

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TRIMET France

CERTIFICATE NUMBER
189

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

DATE OF ISSUE
1 APRIL 2025

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
31 MARCH 2028

ASI ACCREDITED
AUDITING FIRM
**DEKRA
CERTIFICATION**

CERTIFIED SINCE
1 APRIL 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd
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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*

CERTIFICATION SCOPE

Development, manufacture and sale of alloy in the form of wires, slabs and ingots; production of molten Aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET France
CERTIFICATION SCOPE	Development, manufacture and sale of alloy in the form of wires, slabs and ingots; production of molten Aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (6 – 10 December 2021 (On-site) and 22 December 2021 (Remote))Re-Certification Audit and Scope Change (2 – 8 April 2025)
AUDIT FIRM	DEKRA Certification
AUDIT DATE	<ul style="list-style-type: none">6 – 10 December 2021 (On-site) and 22 December 2021 (Remote) (Initial Certification Audit)2 – 8 April 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 February 2022 (Initial Certification Audit)29 May 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (6 – 10 December 2021 (On-site) and 22 December 2021 (Remote))</u></p> <p>The Audit Scope includes the development, manufacturing and sale of alloy in the form of wires, plates and ingots, excluding upstream downstream transport; production of molten Aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).</p> <p>The Audit of the Castelsarrasin site was undertaken remotely, consistent with a multi-site approach for an Initial Certification Audit.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (2 – 8 April 2025)</u></p> <p>The Audit Scope includes the development, manufacturing and sale of alloy in the form of wires, plates and ingots, excluding upstream downstream transport;</p>

production of molten Aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

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

AUDIT OUTCOME	<ul style="list-style-type: none">• 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.

CERTIFICATION PERIOD	1 April 2025 – 31 March 2028
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	31 March 2028
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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

TRIMET France (the 'Entity') is 65% owned by the TRIMET Group (TRIMET Aluminium SE) and 35% by the French energy provider EDF and was created in 2013 following the acquisition of Aluminium production sites. The Saint-Jean-de-Maurienne and Castelsarrasin sites have existed since 1907 and 1856, respectively.

The Saint-Jean-de-Maurienne site implements Alumina electrolysis processes as well as operating a foundry. Current production capacity is approximately 150,000 tonnes per year. The electrodes required for electrolysis are also produced on site. The plant covers 37 hectares and employs approximately 630 people. It also includes the services required for its operation including maintenance, human resources, purchasing, logistics, sales, and laboratory. The molten products are primarily wires, but also plates, T-shaped ingots and smaller ingots. The primary destination of products is within Europe.

The Castelsarrasin site uses the foundry process. The site employs 35 people and has a capacity of approximately 10,000 tonnes, producing only wires. The primary destination of products from site is for within Europe.

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	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a regulatory review as part of a procedure under the Integrated Management System and legal Compliance with Applicable Law is reviewed by external legal firms.
1.2 Anti-Corruption	Conformance	Relevant employees are provided with anti-Corruption training. The Entity has established an internal 'whistleblower' procedure, which identifies the means of gathering any facts related to any allegation reported.
1.3a-e Code of Conduct	Conformance	<p>The Entity has adopted the Code of Conduct established by the German Association for Materials Management, Purchasing and Logistics (BME). The Code commits the Entity to supporting actions in favour of the environment on the part of employees and includes the support of social and governance performance.</p> <p>A Code of Conduct, a Human Rights Code and a Supplier Code, which address environmental, social and governance principles are available for Stakeholders on the Entity's website at: https://www.trimet.eu/en/trimet/compliance</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity's management has implemented a proactive Company Policy. Employees are informed on updates to the Policy, which is communicated externally on the website: https://www.trimet.eu/fileadmin/downloads/fr/Codex/TRIMET_Politique_d_entreprise_2023.pdf</p>
2.2a-c Leadership	Conformance	The Entity has a document formalising the appointment of a Management Representative. Supporting this role is a committee which brings together quality, safety, environment, energy management and integrated Management System managers.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an ISO 14001 certified Integrated Management System. Additionally, the Entity has received a Gold Level rating from Ecovadis.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity's Management System is certified according to ISO 45001 and includes employee participation in risk assessment. The Entity's Corporate Social Responsibility (CSR) approach is outlined in the annual Sustainable Development Report.
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented a Supplier Code of Conduct and communicates all CSR aspects to suppliers in the form of specific requirements.
2.5a-g Environmental and Social Impact Assessments	Conformance	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects. The Entity's projects however are systematically implemented using a V-cycle methodology and upstream stages are undertaken in partnership with staff

CRITERION	RATING	COMMENT
		representatives. Impact Assessments are undertaken by the Entity as required by French law.
2.6a-h Human Rights Impact Assessment	Conformance	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects. The Entity's projects however are systematically implemented using a V-cycle methodology and upstream stages are undertaken in partnership with staff representatives. Impact Assessments are undertaken by the Entity as required by French law.
2.7a-f Emergency Response Plan	Conformance	An Emergency Response Plan (ERP) is legally required as the Entity has a high-threshold Seveso classification. The Entity has a POI (internal operations plan), last updated in March 2025 which identifies the scenarios. The fire department collaborates on the emergency exercises and the subsequent report is provided to the Workers' representatives. The ERP is not available to the general public but is available to relevant Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity has established a business continuity plan, which is a strategic document to ensure the maintenance of the essential infrastructure and their resumption in the event of a major crisis.
2.9a-b Mergers and Acquisitions	Conformance	Mergers and acquisitions are managed by the Entity's parent company TRIMET Aluminum SE.
2.10a-b Closure, Decommissioning and Divestment	Conformance	French Regulations administered under DREAL require the Entity to consider environmental, societal and governance issues in the event of a closure. Closure and decommissioning requirements are the responsibility of the Entity's Supervisory Committee.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity discloses an annual report on its environmental, social and economic impacts and achievements. The Entity's Sustainability Report is available at: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed information on non-compliance and liabilities associated with Applicable Law in the Sustainable Development Report: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf To date, no incidents have been reported.
3.3a-c Payments to Governments	Conformance	The Entity has established an Anti-Corruption Policy and processes to address payments. The Entity does not make payments to the government.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	Interested parties may submit complaints and requests for information to the Entity by contacting the competent persons by various means. Where necessary, confidentiality is guaranteed. The Entity registers and processes all requests from interested parties in accordance with the relevant procedure. Stakeholders can report complaints or claims at:

CRITERION	RATING	COMMENT
		https://www.trimet.eu/fr/trimet/compliance
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	A Life Cycle Assessment (LCA) has been carried out at the Group-level using the GABI software tool. The Entity has developed two Environmental Product Declarations (EPDs) for electrical wire rod, prepared in response to a customer request. The Entity provides information on the publication at the customer's request, as well as the EPD Portal site.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has two EDP's that include information on the potential environmental impacts during the Product's life cycle. This information is available at: https://environdec.com/library/epd3578 https://environdec.com/library/epd3853
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity remelts 100% of its Aluminium Scrap and maintains several indicators and figures to ensure accurate tracking of recycling targets. The Entity has dedicated areas where different types of Scrap are sorted. Remelting instructions have been developed in accordance with relevant calculations that determine the quantities required.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has a partnership with two customers and a recycling facility to maintain a rate of recycled Aluminium of external origin, which it monitors and supervises. A significant investment in a chip compactor at the Saint-Jean-de-Maurienne site supports its strategic objectives.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established commitments with several partners to increase recycling rates and uses indicators to monitor its impact.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Scope 1 and 2 Greenhouse Gas (GHG) emissions data have been reported in the Sustainability Report: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_V9_EN_site.pdf Scope 3 emissions, which represent 40% of the Entity' product carbon footprint, are quantified in its 'Decarbonisation Roadmap' and available upon request via the Entity's website: https://www.trimet.eu/fr/trimet/site/site-de-saint-jean-de-maurienne GHG emissions data are independently verified by a Third Party.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable as Aluminium smelting activities commenced prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity -	Conformance	The Entity's Product life cycle has been certified by an external body (GUTcert). It has been established that total GHG emissions are

CRITERION	RATING	COMMENT
In production up to and including 2020		significantly lower than the 11 tonnes CO ₂ /tonne Aluminium threshold required by the ASI Performance Standard, with 5.9 t CO ₂ /t Al for liquid metal and 6.5 t CO ₂ /t Al for foundry wire.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a GHG Emissions Reduction Plan, or 'Decarbonisation Roadmap', which outlines a GHG Emissions Reduction Pathway that is aligned with the ASI GHG Method ensuring consistency with the 1.5°C warming scenario.</p> <p>The Entity's Indirect GHG Emissions related to the electrical energy supply includes more than 90% decarbonised electricity. The Entity is taking action on its Scope 1 and 2 GHG emissions and planning actions for Scope 3 GHG emissions.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established a GHG Emissions Reduction Pathway using the ASI methodology that includes Scope 1, 2 and 3 GHG emission reduction targets, with a 2023 baseline year. The Entity has published Intermediate Targets for Scopes 1 and 2 and Scope 3 for 2028, 2033 and 2050 and annual performance is published in the Sustainability Report, available at: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_V9_EN_site.pdf</p> <p>The Entity's Decarbonisation Roadmap is available upon request via the Entity's website: https://www.trimet.eu/fr/trimet/site/site-de-saint-jean-de-maurienne</p>
5.4 GHG Emissions Management	Conformance	The Entity's Management System addresses all measures implemented in the context of the reduction of GHG emissions. The Entity has published an annual Sustainability Report that demonstrates the reduction of GHG emissions.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity declares its Emissions to Air to the French environmental administration annually. The Entity's Management System is certified according to ISO 14001 with an action plan to address air emissions. The Sustainability Report discloses air emissions data on page 65: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</p>
6.2 Discharges to Water	Conformance	<p>The Entity's Management System is certified according to ISO 14001 and Discharges to Water are strictly controlled according to the Entity's permit to operate. The French administration (DREAL) regularly monitors the Entity. The Sustainability Report contains information on the environmental impacts, page 56-59: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity's Management System is certified according to ISO 14001 which includes the management of environmental risks including Spills and Leakage. The Entity manages an internal and external communication process with Stakeholders and manages Spills through corrective actions to prevent their occurrence.</p> <p>The Entity's infrastructure is under constant surveillance and responses to Spills and Leakages are documented and known to staff.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity holds an operating license and reports Spills to all the related regulatory declarations which quantify the impacts. The Entity publicly discloses the environmental impact of Spills and Leakages to both the local French environmental administration and in its Sustainability Report, available at:</p> <p>https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has an environmental action plan that includes Waste management and reduction. These actions are implemented in accordance with the Entity's Corporate Social Responsibility (CSR) Policy. The Entity publishes its Waste management and disposal activities, including the quantities of Hazardous and Non-Hazardous Waste, in its annual Sustainability Report, available at:</p> <p>https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</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)	Conformance	<p>The Entity manages Spent Pot Lining (SPL) and slag to prevent their release into the environment. The Entity has commissioned an external consultant to report on the optimisation of SPL, which led to the development of an environmental action plan.</p> <p>No SPL is released into marine and aquatic environments, and internal response plans are implemented for 100-year floods. Spent Pot Lining is managed and stored in a manner that does not impact the environment before being disposed of as Waste. If necessary, SPL is landfilled after stabilisation.</p>
6.8a-d Dross	Conformance	<p>The Entity has an internal procedure and a contract with an external metal refiner to maximise the recovery of Dross and its residues. The Entity has contracts with metal refiners and recycles 100% of its Dross.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has updated the mapping of water withdrawals as part of its leakage remediation work and is implementing an automated process for the measurement of incoming flows. The Entity communicates its water management controls and initiatives with its Stakeholders.</p> <p>The Entity has analysed the risks associated with the supply of cooling water within its Area of Influence and action plans are in place to prevent impact.</p>
7.2a-e Water Management	Conformance	<p>The quantities of water withdrawn from the natural environment are closely monitored. Withdrawn water is used in an open circuit and returned to the waterways adjacent to the sites, the Arc and the Merdailou respectively. The Entity has taken steps to achieve water efficiency at each site. Further details are included in the Sustainability Report, pages 56-59:</p> <p>https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	A Biodiversity assessment was conducted, and a subsequent Biodiversity Action Plan has been implemented. An agricultural expert studies the impact of fluorinated emissions on surrounding vegetation annually and monitoring results demonstrate there has been a reduction in impact.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has implemented numerous tools to assess the risks of affecting Ecosystem Services. This approach relies heavily on external experts. The results are presented in the annual Sustainable Development Report.
8.2a-g Biodiversity Management	Conformance	The Entity has implemented a Biodiversity Action Plan. The Biodiversity Mitigation Hierarchy is respected for each of the actions included in the Plan. The Plan is available for consultation within the Entity. The Sustainable Development Report presents the objectives and actions undertaken to promote Biodiversity: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity has identified sensitive areas that are or could potentially be affected by its activities. It is working with experts to assess the impacts. All employees have been trained in Biodiversity awareness, appropriate to the contribution of their activities.
8.4 Alien Species	Conformance	The Entity's Biodiversity Action Plan includes actions to avoid the introduction of Alien Species that could impact Biodiversity.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Properties located within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has clearly identified Protected Areas likely to be affected by its activities. It has implemented appropriate monitoring, which is presented in the annual Sustainable Development Report.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has developed a Charter of Human Rights and Working Conditions, which is provided to new employees and subcontractors, available at: https://www.trimet.eu/fr/trimet/compliance/code-des-droits-de-lhomme The Entity conforms to European and French law on the protection of the Human Rights for employees and subcontractors. The identification of Stakeholders is documented in the Sustainable Development Report, and Stakeholders were consulted using mechanisms adapted to the type of individuals or organisations

CRITERION	RATING	COMMENT
		concerned. This consultation covered all Corporate Social Responsibility (CSR) topics.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity respects the French law on gender equality and organises consultation with the Unions in various meetings throughout the year. The plan implemented and its effectiveness are presented at the annual training and the equality committee meeting. An agreement on gender equality was signed in 2022, and Harassment Officers have been appointed within the Entity. Further information on diversity and equal opportunities is available in the Sustainable Development Report.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites or values as part of the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has no plans for any displacement that could impact any local population.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has no plans to expand the footprint of its sites. The Entity provides financial support to Local Communities in areas including sports, humanitarian, and heritage.</p> <p>The Entity has implemented measures to consider the rights and interests of all Stakeholders, particularly the local population. Interviews conducted during the Audit confirmed that relations between the Local Communities and the Entity are amicable.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has implemented a procedure to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). Through the implementation of a responsible purchasing Policy, the Entity strives to ensure that its suppliers are not involved in armed conflict or human rights violations.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The TRIMET Group has implemented a Due Diligence process that includes the identification and assessment of risks related to CAHRAs in its supply chain. This monitoring has determined that there are currently no Material risks identified in the supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented a Policy that includes the way to respond to identified CAHRAs risks in its Aluminium supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	Internal audits are conducted regularly to assess that the Entity's responses are appropriate and compliant. Additionally, the Entity's Due Diligence practices were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The TRIMET Group annually publishes its commitment and guidelines on CAHRAs, available at: https://www.trimet.eu/fileadmin/downloads/de/zertifikate/Directive_relative_aux_zones_affectees_par_des_conflits_et_a_haut_risque_-_2024.pdf
9.9 Security practice	Conformance	The Entity engages a security provider that respects its Corporate Social Responsibility (CSR) Policy, which prescribes the standards required with respect to Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects French law requiring it to adhere to a Collective Agreement. Unions and elected officials are present on site and can conduct their activities in accordance with regulations.
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 French law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	In France, Child Labour is punishable under Applicable Law. The Entity expects its suppliers to respect child protection by requiring them to adhere to a Code of Conduct.
10.3a-c Forced Labour	Conformance	The Entity implements a CSR Policy, complies with French law, and does not engage in or support Forced Labour. This commitment applies not only to its employees, but also to all suppliers, who are subject to a Code of Conduct that they must adhere to. The Entity's Modern Slavery Statement is available on the Entity's website at: https://www.trimet.eu/fileadmin/downloads/de/Berichte/Declaration_sur_l_esclavage_moderne_-_2024.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Human Rights Code of Conduct. The Entity expects the same from its suppliers in its Supplier Code of Conduct. The French law, which requires public disclosure on the gender equality index, is respected.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity has established the mandatory 'Social and Economic Commissions' provided for by the <i>Labor Code</i> to ensure the participation and representation of employees regarding their working conditions.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented a system to allow employees to report information that may constitute Discrimination. Responsible officers have been trained and appointed. All employees have been made aware of the issue of Harassment.</p> <p>The Entity adheres to a Code of Conduct that encompasses these themes and is available at: https://a.storyblok.com/f/104752/x/9dbb349ac2/bme_code_of_conduct_de_neues-logo-en.pdf</p>
10.7a-c Remuneration	Conformance	The Entity complies with applicable Collective Bargaining Agreements, and salaries are in accordance with the Agreements. All salary payments are documented and deposited into employees' bank accounts on the 30 th of the current month.
10.8a-c Working Time	Conformance	Working hours are recorded electronically and paid monthly. Management of the Working Time respects French regulations.
10.9a-b Informing Workers of Rights	Conformance	The Entity has implemented numerous measures to ensure that employees are aware of their rights in compliance with French regulations.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is certified according to ISO 45001 and external audits have not identified a non-conformance since 2020.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System is ISO 45001 certified. The Entity's Health and Safety performance is available in the annual Sustainability Report: https://www.trimet.eu/fileadmin/downloads/fr/RDD/TRIMET_RAPPORT_2023_site.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity implements a Social and Economic Commission (CSE), as required by French law, where management and Workers' representatives meet to discuss OH&S performance and initiatives at least four times per year.</p> <p>The Entity has implemented an intranet-based tool to allow Workers and external companies (including contractors) to report on OH&S issues.</p>

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directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 April 2022	Initial Certification Audit – Full Certification
1	22 August 2025	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply Performance Standard V3.1; Extension of expiration date of previous Certification approved by ASI.