

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hammerer Aluminium Industries Extrusion GmbH

CERTIFICATE NUMBER
202

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

DATE OF ISSUE
4 MAY 2025

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
3 MAY 2028

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

CERTIFIED SINCE
4 MAY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', 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*

CERTIFICATION SCOPE

Production of extruded Aluminium
profiles, Aluminium profiles
fabricated and surface-treated,
components made of Aluminium
fabricated/welded and Aluminium
Composite profiles, thermally
insulated, at Ranshofen (Austria).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion GmbH
CERTIFICATION SCOPE	Production of extruded Aluminium profiles, Aluminium profiles fabricated and surface-treated, components made of Aluminium fabricated/welded and Aluminium Composite profiles, thermally insulated, at Ranshofen (Austria).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (12 – 25 February 2022)• Re-Certification Audit and Scope Change (14 – 16 April 2025)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 12 – 25 February 2022 (Initial Certification Audit)• 14 – 16 April 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 13 April 2022 (Initial Certification Audit)• 9 July 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (12 – 25 February 2022)</u></p> <p>The Audit Scope covers the production of extruded Aluminium profiles, Aluminium profiles fabricated and surface-treated, components made of Aluminium fabricated/welded, Aluminium Composite profiles, thermally insulated.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Semi-Fabrication• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included an on-site Audit (12 – 14 January 2022) and a remote Audit (24 – 25 February 2022).</p> <p><u>Re-Certification Audit and Scope Change (14 – 16 April 2025)</u></p> <p>The Audit Scope included the production of extruded Aluminium profiles, Aluminium profiles fabricated and surface-treated, components made of Aluminium fabricated/welded and Aluminium Composite profiles, thermally insulated, at Ranshofen (Austria).</p> <p>Supply chain activities included in the Audit Scope:</p>

-
- Semi-Fabrication
 - Material Conversion

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

AUDIT OUTCOME

- Certification

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

4 May 2025 – 3 May 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

3 November 2026

CERTIFICATE NUMBER

202



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

The Hammerer Aluminium Industries (HAI) Group, headquartered in Ranshofen/Braunau (Upper Austria), produces complete Aluminium solutions (profiles and processed products) for the construction, transport, electrical and mechanical engineering and plant engineering sectors. The HAI Group has existed in this form since 2007 and has achieved extremely rapid, dynamic and at the same time healthy growth in recent years.

Since the HAI Group was founded, it has expanded to eight locations in four countries and established a joint venture company in South Korea. The annual tonnage processed has increased to 250,000 tonnes, and the turnover has multiplied from 110 million euros to 823 million euros in 2024. The team has expanded from 350 to around 2,000 employees.

HAI Group offers innovative solutions made of Aluminium and covers the entire value chain from recycled input material to sophisticated profiles and complex components, taking into account all sustainability aspects. HAI Group relies on state-of-the-art production facilities and comprehensive research and development, especially for new alloys.

Hammerer Aluminium Industries Extrusion GmbH (the 'Entity') is a subsidiary of the HAI Group and is located in Ranshofen, Austria. The Entity produces extruded Aluminium profiles, fabricated/welded components made of Aluminium and thermally insulated Aluminium composite profiles. The Entity's annual production capacity is approximately 35,000 tonnes, and it primarily supplies Aluminium components for the automotive industry in Europe. The Entity employs approximately 500 Workers.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	High	Medium	MEDIUM
RISKS	High	High	Medium	HIGH
PERFORMANCE	High	High	Medium	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard's legal Compliance requirements. There are systems in place such as a legal database to maintain awareness of, and to ensure Compliance with Applicable Law. The Entity holds valid ISO 14001 and ISO 45001 certifications from an accredited certification body. The HAI Group supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing International Standards.</p> <p>The Entity has published and communicated a Code of Conduct for its employees, where it is clearly stated that the Entity in no way tolerates Corruption, antitrust violations, bribes, money laundering, unfair advantages or prohibited agreements. Furthermore, an Anti-Corruption Policy has been issued and communicated. Employees receive periodic training in the Policy. The Anti-Corruption Policy and the Code of Conduct are available at: https://www.hai-aluminium.com/downloads</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued and implemented its Anti-Corruption Policy and its Codes of Conduct (for employees and suppliers) at a Group level. The Entity's employees have been trained on these Policies/Codes through e-learning. The Code of Conduct has been updated recently in February 2025.</p> <p>The Anti-Corruption Policy and the Codes of Conduct are accessible at: https://www.hai-aluminium.com/downloads</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with the Environmental, Social and Governance (ESG) practices included in the ASI Performance Standard. The Policies are the subject of periodic employee training. The Entity holds certificates according to ISO 14001, ISO 45001, IATF 16949 and TISAX from an accredited certification body which correspond to the Entity's ASI Certification Scope.</p> <p>The Entity's Chief Operating Officer has overall responsibility and authority for ensuring conformance with the ASI Performance Standard. The Entity's Environmental Health and Safety (EHS) Policy and Code of Conduct for Employees are endorsed by both Managing Directors and are periodically reviewed as required by ISO 14001 and ISO 45001.</p> <p>The Entity has communicated the Policies internally and externally as appropriate (company website, intranet, training sessions). The Code of Conduct for Suppliers is actively communicated to suppliers. Interviews with Workers and management confirmed that the communication is effective.</p> <p>The EHS Policy is publicly available and is accessible at: https://www.hai-aluminium.com/en/download-center</p>
2.2a-c Leadership	Conformance	The Entity's Chief Operating Officer has overall responsibility and authority for ensuring conformance with the ASI Performance

CRITERION	RATING	COMMENT
		Standard and to ensure sufficient resources to support the implementation of the Standard. The role is supported by the Quality Manager and staff from HAI Group. Responsibilities are reflected in organisational charts.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System (EMS) according to ISO 14001:2015. The EMS is certified by an accredited certification body and the certificate is accessible at: https://www.hai-aluminium.com/en/download-center
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	The Entity demonstrated compliance with social regulations and principles with some processes documented. However, a documented framework for all relevant social rules and activities has not been developed and as such there is an inadequate description of processes and responsibilities, Key Performance Indicators (KPIs), goals and an associated action plan.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has issued its responsible sourcing Policy at a Group level in its Code of Conduct for Suppliers, accessible at: https://www.hai-aluminium.com/downloads</p> <p>A systematic supplier evaluation scheme is implemented.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity is situated in an established industrial site, developed over 70 years ago. A project to build a new logistics centre commenced in 2023, and opened in June 2024.</p> <p>The Entity is located in a highly regulated country (Austria) where relevant projects and changes (linked to construction activities) undergo a thorough analysis and authorisation process, and the Entity has systems in place to manage this effectively. The Entity has specified in a procedure that Impact Assessments will be conducted as necessary.</p> <p>In the case of the logistics centre, the Environmental Impact Assessment was completed as part of the obligatory permitting process.</p> <p>A Social Impact Assessment was not required, as the project involved only relocating workplaces from the old logistics hall into the new centre. The project had no significant influence on the community.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity is situated in an established industrial site, developed over 70 years ago. A project to build a new logistics centre commenced in 2023, and opened in June 2024. A Social Impact Assessment was not required, as the project involved only relocating workplaces from the old logistics hall into the new centre. The project had no significant influence on the community. No other New Projects or Major Changes have not taken place since the Entity joined ASI.</p> <p>The Entity is located in a highly regulated country (Austria) where relevant projects and changes (linked to construction activities) undergo a thorough analysis and authorisation process and the Entity has systems in place to manage this effectively. The Entity has specified in a procedure that Impact Assessments will be conducted as necessary.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented a site-specific Emergency Response Plan, prepared in collaboration with relevant Stakeholders such as relevant

CRITERION	RATING	COMMENT
		<p>authorities and industrial neighbours. The Entity also holds ISO 14001 and ISO 45011 certifications.</p> <p>The Emergency Response Plan is available to relevant Stakeholders on request.</p>
2.8a-d Suspended Operations	Minor Non-Conformance	<p>The Entity has addressed environmental impacts of normal and abnormal situations as part of its ISO 14001 certified EMS. Due to the nature of the Business (extrusion), the environmental impacts of a suspended operation are likely to have limited impact.</p> <p>However, at the time of the Audit, a documented Business Resilience Plan had not yet been established and the Emergency Response Plan does not include information in the event of suspended operations.</p> <p>The Entity has commenced the necessary work to prepare a Business Resilience Plan.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has not undergone nor planned a Merger or Acquisition (M&A) since becoming an ASI Member.</p> <p>However, a process has been defined to manage M&As, should it become relevant.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>A procedure for closure, decommissioning and divestment is established. There have been no such cases since the Entity joined ASI.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts via the HAI Group's Sustainability Report. The Sustainability Report has been developed based on the reporting standard of the Global Reporting Initiative, and is available at: https://www.hai-aluminium.com/downloads/</p>
3.2 Non-compliance and Liabilities	Conformance	<p>Information about significant fines, judgments, penalties and non-monetary sanctions is included in the HAI Group's Sustainability Report 2024, page 75, which confirms that 'In the 2024 reporting period, no fines or non-monetary sanctions were imposed for non-compliance with environmental laws or regulations or for serious violations of other applicable laws or regulations.'</p> <p>The Sustainability Report is accessible at: https://www.hai-aluminium.com/downloads/</p>
3.3a-c Payments to Governments	Conformance	<p>As confirmed by the HAI Group's management and as stated in the HAI Group's Sustainability Report 2024, page 75: 'No financial or in-kind contributions were made to governments, political parties, politicians or related organisations during the reporting period.'</p> <p>The Sustainability Report is accessible at: https://www.hai-aluminium.com/downloads/</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established accessible Complaints Resolution Mechanisms adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established: ethics@hai-aluminium.com</p>

CRITERION	RATING	COMMENT
		<p>A second communication channel is accessible for all Stakeholders: https://www.hai-aluminium.com/compliance-line</p> <p>Employees can also direct their concerns to the Worker representatives. Due to the size and nature of the business, Stakeholders can also easily reach senior management directly.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Products in a Life Cycle Assessment (LCA), developed in accordance with ISO 14040 and ISO 14044 standards. The LCA study was completed by a specialised external institute. The Entity provides LCA information on request.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	Document review and interviews confirmed that the Entity does provide adequate 'cradle-to-gate' LCA information to customers on request.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as the Entity has no design responsibility. All design specifications are provided by its customers.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented systems and a robust program to recycle 100% of its Aluminium Process Scrap. This Scrap is recycled at the Entity's sister plant (HAI GmbH), located in the same industrial zone.</p> <p>The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium. The effectiveness of these processes was observed during the site tour.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity's recycling strategy is driven by HAI Group's Re-Melting/Casting plant in Ranshofen, Austria which collects Aluminium Scrap (including End of Life products) for its own melting and casting production. In addition, the HAI Group works with national and international Scrap dealers to secure material for the Re-Melting/Casting plant. Approximately 80% of the Aluminium used is secondary material, as disclosed in the HAI Group's Sustainability Report 2024, page 26, available at: https://www.hai-aluminium.com/wp-content/uploads/2025/08/sustainability-report-en_2024.pdf</p> <p>However, a documented recycling strategy specific to the Entity, including specific timelines, activities and targets is not publicly available.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	As a manufacturer of automotive parts, the Entity supplies its Products to other businesses (i.e. 'B2B') but not to consumers (i.e. not 'B2C'). However, the HAI Group closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products and works with national and international Scrap dealers to secure the material for their Re-Melting/Casting plants.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has disclosed at a Group level its Greenhouse Gas (GHG) emissions data and energy use by source in its Sustainability Report

CRITERION	RATING	COMMENT
		<p>2024, pages 28, 31 and 35: https://www.hai-aluminium.com/downloads/</p> <p>However, in contrast to other sites of the Group, independent verification of the energy and GHG emissions data covering the period 2024 was not yet available at the time of the Audit.</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	Conformance	The HAI Group has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway that is consistent with the ASI Entity level GHG Pathways Calculation Tool. Both the Plan and Pathway are disclosed in the Sustainability Report 2024, page 28, accessible at: https://www.hai-aluminium.com/downloads/
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The HAI Group has established GHG emissions reduction targets and implemented an effective Plan to achieve these targets. Information on this Plan, including the Entity's annual progress is disclosed in the Sustainability Report 2024, pages 28-31, accessible at: https://www.hai-aluminium.com/downloads/
5.4 GHG Emissions Management	Conformance	The Entity demonstrated that a system and processes are in place to implement its GHG emissions reduction targets. The GHG Management System is integrated into the Entity's EMS, which is certified to ISO 14001.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Data on the Entity's Emissions to Air are collected and the data is reported in the HAI Group's annual Sustainability Report 2024, page 31: https://www.hai-aluminium.com/downloads/</p> <p>Values for carbon monoxide (CO) and nitrous oxides (NOx) parameters are clearly stated.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity does not directly discharge effluent into waters such as creeks or rivers. Instead, effluent is treated in a neighbouring industrial wastewater treatment plant in accordance with the Austrian Indirect Discharger Ordinance.</p> <p>The Entity reports its Discharges to Water in the HAI Group's Sustainability Report 2024, page 36, available at: https://www.hai-aluminium.com/downloads/</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>Within the scope of its ISO 14001 certified EMS, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water or soil.</p> <p>As part of its EMS, the Entity has established management and communication plans, compliance controls and a monitoring</p>

CRITERION	RATING	COMMENT
		programme to prevent and detect Spills and Leakages. One important element implemented is the preventive/predictive maintenance of its technical equipment.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	As reported in the HAI Group Sustainability Report 2024, page 42, there was no significant release of substances in the reporting period: https://www.hai-aluminium.com/downloads/
6.5a-c Waste Management and Reporting	Conformance	In accordance with its ISO 14001 certified EMS, the Entity has documented and implemented a Waste Management Strategy in accordance with the Waste Mitigation Hierarchy. The Entity publicly disclosed the quantity of the Waste generated in its operations in the HAI Group sustainability report 2024, page 38, available at: https://www.hai-aluminium.com/downloads/
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has implemented a system to identify and map its water withdrawal and use by source and type. Water is supplied by and discharged to a neighbouring industrial company. The Entity's water requirement is fully supplied by its industrial neighbour, an ASI Performance Standard Certified Entity. As such, water-related risks have been assessed by the industrial neighbour.
7.2a-e Water Management	Minor Non-Conformance	The Entity has developed a water management plan. However, this plan has not been made publicly available. All water is supplied by the Entity's industrial neighbour, an ASI Performance Standard Certified Entity. The water related risks were identified by the neighbouring Entity as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	The Entity has systematically assessed the risks and Materiality of its impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. A documented Biodiversity Assessment Report is available. However, at the time of the Audit the assessment did not cover Ecosystem Services, as the Entity is relying on an assessment that was conducted in 2021, a time where there wasn't a requirement to consider Ecosystem Services. The next update of the study is planned for 2026.
8.1b Biodiversity and Ecosystem Services Risk	Minor Non-Conformance	The Entity's 2021 Biodiversity Assessment Report does not specifically address Ecosystem Services. An update of the study is planned for 2026.

CRITERION	RATING	COMMENT
and Impact Assessment - Priority		Due to the type and nature of the business and its location within an industrial zone, it may be that the Entity does not impact Ecosystem Services significantly, despite the lack of formal assessment.
8.2a-g Biodiversity Management	Conformance	The Biodiversity assessment concluded that "relevant risks and immediate mitigation actions regarding the biodiversity on and around the site could not be identified". However, the Entity is regardless investigating possibilities to improve Biodiversity outcomes and has developed a plan accordingly.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as due to the Entity's location in an industrial area and the size and nature of its business, its impact on the local Biodiversity and Ecosystem Services is considered to be low. Management concluded that the Entity does not depend on Priority Ecosystem Services.
8.4 Alien Species	Conformance	As part of the Biodiversity assessment the Entity has assessed risks regarding Alien Species. A relevant risk identified is the wooden pallets used by the Entity; this risk is mitigated as the pallets are all treated according the International Standards for phytosanitary measures No. 15 (ISPM-15). Alien plants are destroyed by the gardener, if detected.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not operate, plan to explore nor develop New Projects in or close to World Heritage Properties. The Entity's production site is located in Ranshofen, Austria, which is a long-established industrial zone.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as in 2021 a Biodiversity Assessment confirmed the absence of Protected Areas in 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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity at a Group level has issued a Code of Conduct for employees and a Code of Conduct for suppliers, which both express a commitment to respect Human Rights as defined by the UN Human Rights Conventions, in particular the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the EU Charter of Fundamental Rights and employees are prohibited from directly or indirectly violating these Human Rights principles. All employees receive mandatory annual training on the Code of Conduct.</p> <p>The Codes of Conduct are accessible at: https://www.hai-aluminium.com/downloads</p> <p>The HAI Group has conducted a documented Human Rights Due Diligence assessment. There are currently no salient issues with regards to Human Rights at the Entity.</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the requirements for the protection of women's rights. During the site tour, interviews and document review, no indication for deliberate Discrimination against women was observed. In its Sustainability Report, the HAI Group reports publicly the number of female/male Workers in 2024 (p.57) and further gender related parameters (p.81). The Report is accessible at: https://www.hai-aluminium.com/downloads/
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity 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 to the Entity 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 to the Entity 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 to the Entity as there are no sacred or cultural heritage sites or values within the Entity's Area of Influence identified. Further, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no sacred or cultural heritage sites or values within the Entity's Area of Influence identified. Further, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as no resettlements or displacements are being considered or have taken place in the period since joining ASI. No displacement is expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with Local Communities and therefore no need for action. The Entity is located in an industrial zone in Austria.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has implemented standards for its supply chain which clearly define the rules and expectations for suppliers, contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.

CRITERION	RATING	COMMENT
		The Entity follows the definition of Conflict-Affected and High-Risk Areas (CAHRAs) from the Armed Conflict Location Event Data Project and from Peace Direct.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has implemented standards for its supply chain which clearly define the rules and expectations for suppliers, contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.</p> <p>According to the Entity's identification of suppliers, no supplies are sourced from a CAHRA.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented a basic strategy to respond to identified risks in their supply chain. As a final stage in the response process, the Entity may terminate business activities with the supplier.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity was Audited against the ASI Performance Standard which includes an Audit on Due Diligence processes and as such addresses the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The HAI Group has implemented a supply chain Due Diligence process and has publicly reported on the process in its Sustainability Report 2024, page 46, accessible at: https://www.hai-aluminium.com/downloads/
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations caused by the security service. Security is operated by the neighbouring company, also an ASI Performance Standard Certified Entity.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to unite freely in Labour Unions, seek representation and to join the Workers' council without interference. A freely elected Worker representation process has been established.</p> <p>Collective Bargaining Agreements with the Union and the Workers' representatives apply.</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as the Right to Freedom of Association and Collective Bargaining is not restricted in Austria, the country where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker (an apprentice) at the Entity was above 15 years of age. Minors (15-18 years) are only employed as apprentices and receive formal vocational training.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.</p> <p>The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review.</p> <p>The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.</p> <p>The risk of Forced Labour has been assessed in the HAI Group's Human Rights Due Diligence.</p> <p>The HAI Group has issued a Modern Slavery Statement applicable to the Entity, accessible at: https://www.hai-aluminium.com/downloads/</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-discrimination and communicates this commitment in its Code of Conduct. The Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with its Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, gender-based Violence including sexual harassment, or verbal abuse of Workers.</p> <p>The HAI Group has issued and publicly communicated its Policy on Violence and Harassment that is applicable to the Entity, available at: https://www.hai-aluminium.com/downloads/</p> <p>Interviewed Workers did not report any instances of Violence or Harassment.</p>
10.7a-c Remuneration	Conformance	<p>The lowest wage paid by the Entity is well above the industry Collective Bargaining Agreement. Payments are made in a timely manner, in legal tender and are fully documented. Payments are made monthly via transfer to employee's bank accounts.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Overtime is voluntary.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>As confirmed by interviews with Workers and Human Resources management during the Audit, the Entity's Workers are informed on Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the HAI Group's Code of Conduct and the Corporate Social Responsibility Policy.</p>

CRITERION	RATING	COMMENT
		Labour Laws that require notice (posting) are accessible via the HAI intranet and an app on the employees' mobile phones.
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 ISO 45001:2018 certified by an accredited certification body.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has defined and is monitoring OH&S related leading and lagging performance indicators. Performance indicators have been made publicly available in the HAI Group's Sustainability Report, pages 69 and 85, available at: https://www.hai-aluminium.com/downloads/</p> <p>However, the performance data does not include a comparison with leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a joint Health and Safety committee, which meets three times per year.</p> <p>Additional mechanisms are in place where Workers can raise, discuss and participate in the resolution of occupational Health and Safety issues with management.</p> <p>The Entity is certified according to ISO 45001:2018.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	4 May 2022	Initial Certification Audit - Full Certification
1	17 September 2025	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply ASI PS V3.1. Correction to the Entity's supply chain activities to include 'Semi-Fabrication'.