

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Real Alloy – Coldwater North and South Facilities

CERTIFICATE NUMBER
231

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

CERTIFICATION
LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
10 OCTOBER 2025

DATE OF EXPIRY
9 OCTOBER 2026

CERTIFIED SINCE
29 NOVEMBER 2022

AUTHORISED BY

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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

Recycling of Aluminium Scrap and
production of wrought and cast
alloys according to customer
specification at Coldwater North
and South facilities in Michigan
(USA), plus central strategic and
administrative functions managed
by REAL ALLOY Headquarters in Ohio
(USA).

* Provisional Certification is valid
for the period of one year, during
which the company can address
the non-conformances assessed
and subsequently seek full
certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	REAL ALLOY
ENTITY NAME	REAL ALLOY Coldwater North and South Facilities
CERTIFICATION SCOPE	Recycling of Aluminium Scrap and production of wrought and cast alloys according to customer specification at Coldwater North and South facilities in Michigan (USA), plus central strategic and administrative functions managed by REAL ALLOY Headquarters in Ohio (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (2 – 6 May 2022)Re-Certification Audit and Scope Change (5 – 13 August 2025)
AUDIT FIRM	<ul style="list-style-type: none">DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">2 – 6 May 2022 (Initial Certification Audit)5 – 13 August 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 October 2022 (Initial Certification Audit)13 September 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (2 – 6 May 2022)</u></p> <p>The Audit Scope included the production and all operations at REAL ALLOY Coldwater North and South plants, and strategic and administrative functions at REAL ALLOY Headquarters.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium 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 (5 – 13 August 2025)</u></p> <p>The Audit Scope included the production and all operations at REAL ALLOY Coldwater North and South plants, and strategic and administrative functions at REAL ALLOY Headquarters.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

AUDIT OUTCOME

- Provisional 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.
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CERTIFICATION PERIOD

10 October 2025 – 9 October 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

9 April 2026

CERTIFICATE NUMBER

231



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

Real Alloy is an Aluminium recycling and re-melting enterprise with facilities in the United States. The corporate headquarters in Beachwood, Ohio and was established in 2016, which serves as the central hub for management, policy, and functional support. The two production facilities in Coldwater, Michigan (the 'Entity') commenced operations in 1996-97 and currently have a total workforce of approximately 230 employees and contractors, including over 50 women.

The primary activities at the Entity include the processing of Scrap Aluminium through the use of shredding, drying, and remelting in casthouses. The resulting saleable products include molten metal, ingots, sow, and 'deox' cones. With an annual production capacity of over 38,000 metric tonnes at the Coldwater North site and 54,000 metric tonnes at the Coldwater South site, the Entity is a key supplier to the automotive and other markets. The Entity's facilities are situated on a combined area of 31 hectares, with key features including furnace buildings, Dross storage, and casting lines, with both facilities surrounded by areas of grassland, forest and wetlands.

The Entity engages with key external stakeholders, including the local community, neighbouring businesses, and the local Chamber of Commerce. It provides products for both the general market and also process toll material for customers, which is then returned to the Entity as a secondary material.

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	Medium	High	Medium	MEDIUM
PERFORMANCE	High	High	High	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Real Alloy ensures Compliance with Applicable Law by maintaining a legal department and implementing monitoring mechanisms at the Entity level. Methods to maintain awareness throughout the Entity include membership in industry groups such as The Aluminum Association and subscriptions to 'function-specific' newsletters in disciplinary areas including Human Resources and Health, Safety, and Environment.
1.2 Anti-Corruption	Conformance	<p>The Entity's Code of Conduct and Ethics addresses anti-Corruption and Bribery and is communicated to all employees during the onboarding process. It also addresses the provision and receipt of gifts and entertainment for employees.</p> <p>Cash gifts are prohibited. A 'hotline' is available to all employees to inform the legal department of any allegations of wrongdoing. The Entity's Charitable Contributions and Sponsorship Policy also outlines the requirements for any charitable contributions made to organisations. The Entity's Code of Conduct and Ethics is available at: https://realalloy.com/sustainability-solutions</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity's Code of Conduct and Ethics includes principles relevant to environmental, social and governance performance and requirements. It is communicated with other Policies during the employee 'onboarding' process and also is physically posted throughout the Entity's workplace.</p> <p>The Code is available at: https://realalloy.com/sustainability-solutions</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>Real Alloy has implemented various 'stand-alone' Policies, including, (but not limited to) the Health and Safety, Environmental and Quality (HSEQ) Policy, Anti-Discrimination and Anti-Harassment Policy, Code of Conduct and Ethics, a Workplace Discrimination, Harassment and Violence Policy and a Supplier Sustainability Policy.</p> <p>All Policies are communicated to all employees during the onboarding process. The Code of Conduct and Ethics, Anti-Discrimination Policy, HSEQ Policy and other relevant Policies are also posted throughout the workplace and available to employees on request. Key policies are communicated externally and are available at: https://realalloy.com/sustainability-solutions/</p> <p>The Code of Conduct and Ethics, the Anti-Corruption Policy, the HSEQ Policy and the Supplier Sustainability Policy however have not been officially endorsed by senior management.</p>
2.2a-c Leadership	Conformance	The Corporate Sustainability Manager is responsible for the overall control, distribution, implementation, and ongoing enforcement of conformance with the ASI Performance Standard. This responsibility has been stated in the Real Alloy Sustainability Procedure.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity's' Environmental Management System (EMS) is certified against ISO 14001:2015 Standard. The Real Alloy Health, Safety and Environmental Management Process describes the different procedures, policies and documentation of the EMS. The Entity has completed an environmental risk assessment including actual and potential measure of controls identified to mitigate environmental impacts and improve their performances. Several control measures are implemented including housekeeping, work Instructions, maintenance activities, management plans, training and awareness.</p> <p>The Entity has developed and implemented a strategic action plan to identify and plan actions to improve environmental performance and reduce impacts and to ensure all monitoring and reporting activities are performed according to legal and internal requirements.</p> <p>Corporate Health and Safety and Environmental internal audits are performed on a regular basis for both Facilities.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>A risk-based Social Management System is defined in the Entity's Sustainability Procedure which includes documentation and reviews. A baseline risk assessment based on the UN Global Compact Self-Assessment tool has been performed to identify social impacts as well as actual and potential measure of controls.</p>
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>Real Alloy North America has implemented a Supplier Sustainability Policy detailing ESG expectations for suppliers, of which the Entity adheres to. The Policy is available at: https://realalloy.com/sustainability-solutions/</p> <p>A risk assessment for suppliers of metal, non-metal and transportation is performed and reviewed periodically. Any risks identified are reviewed by senior management to determine appropriate mitigation actions. Factors considered include, origin of material, suppliers, type of material, value of transaction and unusual circumstances.</p> <p>The supplier risk assessment process defined in the sustainability procedure is not however formally established and communicated throughout the Entity.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity as no New Projects or Major Changes took place since the last Audit nor is planned to take place in the future.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity as no New Projects or Major Changes took place since the last Audit nor is planned to take place in the future.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented a documented, site-specific Emergency Response Plan (ERP) that addresses multiple emergency scenarios and defines roles and responsibilities from management to employees. The ERP is developed in consultation with Workers through post-exercise reviews, and in collaboration with relevant external agencies, such as the local fire department and county emergency services.</p> <p>The ERP is regularly reviewed with the last update completed in January 2025. It is also updated following changes in operations or lessons learned from drills and real events. The Entity tests the ERP through annual training and drills, including 'shelter-in-place' exercises and joint chlorine emergency drills with local fire</p>

CRITERION	RATING	COMMENT
		departments. The current version of the ERP is disclosed and available upon request and shared with relevant agencies, including the fire department and local emergency planning committees, which ensuring appropriate external coordination.
2.8a-d Suspended Operations	Minor Non-Conformance	<p>The Entity has implemented an emergency response procedure to address operational environmental and Health and Safety related potential impacts occurring from a suspended operation due to an emergency situation.</p> <p>In case of suspended operations or a significant alteration of operations due to factors outside its control, a crisis management plan is planned to be elaborated on a 'case-by-case' basis. The development of a documented business resilience plan to address ESG impacts of suspended or significantly altered operations is in progress, thus has not been fully implemented.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has implemented 'management of change' processes that identify any environmental, Health and Safety and social impacts in case of future major projects. A complete Due Diligence exercise to identify those impacts is performed for any acquisition or merger, a process lead by the Entity's legal department. The results of the Due Diligence process, including the identification and assessment of risks, are typically documented in a Due Diligence report and are reviewed and discussed with senior management.</p> <p>At the time of the Audit, no project with acquisition or merger event had occurred in the past year.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity reviews Environmental, Social, and Governance (ESG) issues as part of its 'management of change' process for any closure, decommissioning, or divestment; this process involves a cross-functional team including operations, health, safety, environment, and legal to manage and record risks and is described in the Sustainability Procedure for Closure, Decommissioning and Divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity discloses its governance approach and environmental, social and economic impacts through the annual Real Alloy Sustainability Report. The report is publicly available at: https://realalloy.com/sustainability-solutions/</p> <p>Real Alloy completes other sustainability surveys through EcoVadis, the Carbon Disclosure Project (CDP) and other types of public reports.</p>
3.2 Non-compliance and Liabilities	Conformance	For both 2023 and 2024, the Entity did not receive any significant fines, convictions, penalties, or non-monetary sanctions. A procedure is in place to publicly disclose any such sanctions in future Sustainability Reports, should they occur in future.
3.3a-c Payments to Governments	Conformance	The Entity only makes legal or contractual payments to Governments, as described in the 'Corruption and Bribery' section (page 3) of the Code of Conduct, available at : https://realalloy.com/wp-content/uploads/2023/12/REAL_ALLOY_Code_of_Conduct_English_only.pdf

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has established a Complaints Resolution Mechanism as part of its Sustainability Procedure, providing multiple channels for employees and external Stakeholders to raise concerns. Complaints are formally logged, tracked, and investigated, with follow-up provided to ensure adequate closure. Employees are informed of this process during the 'onboarding' process and through workplace postings, while external Stakeholders can access contact information on the Entity's website.</p> <p>The Mechanism however is not fully accessible, nor publicly disclosed to all relevant Stakeholders beyond what is considered as limited website information.</p>

4. MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment	Conformance	Real Alloy uses the Life Cycle Assessment (LCA) work completed by The Aluminum Association, which details many aspects of the Aluminium value chain. This includes 'The Environmental Footprint of Semi-Fabricated Aluminum Products in North America', published in 2022 that uses the recycled content 'cut-off' approach. Real Alloy has contributed to these Life Cycle Assessments through the sharing of information and data as a member organisation of The Aluminum Association.
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	Real Alloy has developed a tool to calculate the 'cradle-to-gate' LCA of carbon impacts of a specific product, which consists predominantly of the production impacts, as Aluminium Scrap is introduced to the process (the 'cradle') and using the recycled content approach ('cut-off'). This information is made available via The Aluminum Association at: https://www.aluminum.org/SustainabilityReports
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 has implemented measures to minimise the generation of Scrap and ensure that all materials are recycled. Systems are in place to manage non-conforming products and to maintain proper segregation of material, reducing the risk of cross-contamination. Scrap volumes are monitored and reviewed to identify areas for improvement, and procedures have been strengthened to support the objective of complete recovery and reuse of material.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	As a recycler, Real Alloy is a part of the regional and national recycling system. The Entity has partnered with The Aluminum Association for marketing videos promoting Aluminium recycling as a sustainable solution. The Entity is also engaged with Scrap aggregators to purchase Aluminium Scrap of all types, including Pre- and Post-Consumer Scrap.

5. GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity accounts for all Material GHG emissions and energy use (Scopes 1, 2 and 3), by sources, on an annual basis and has disclosed these data publicly via the Real Alloy Sustainability Report available at: https://realalloy.com/sustainability-solutions/</p> <p>Data for each Facility, the total equivalent CO₂ emissions and CO₂ intensity by tonnes of Aluminium produced is disclosed in the Sustainability Report. All consumption data are collated monthly from each plant. Standard GHG protocols are used to calculate equivalent emissions from different types of sources and fuels and data from regional electricity grids are used.</p> <p>Scope 1 and 2 GHG emissions data of 2024 were independently verified prior to their publication, however Scope 3 data were not verified.</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	<p>Real Alloy North America has established a GHG Emissions Reduction Plan consistent with its GHG Emissions Reduction Pathway determined using the ASI emission reduction pathways calculation tool, which includes Direct and Indirect GHG emissions (Scopes 1, 2 and 3).</p> <p>The Entity's GHG Emissions Reduction Plan is detailed in a 'Net Zero Waterfall' document as a decarbonisation strategy.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The GHG Emissions Reduction Pathway as well as the 'Net Zero Waterfall' reduction plan have both set a baseline of 2024. An Intermediate Target of a 6.5% reduction in GHG intensity by 2029 has been established. The Entity's decarbonisation strategy established in the 'Net Zero Waterfall' document identifies several plans and improvement actions to achieve at both a corporate level and Entity level. This document is reviewed at least annually and adjusted as required.</p> <p>The Reduction Pathway, Intermediate Target and a global overview of reduction opportunities are published through the Real Alloy Sustainability Report available at: https://realalloy.com/sustainability-solutions/</p> <p>The latest version of the GHG Emissions Reduction Plan as set out in the 'Net Zero Waterfall' document to achieve the GHG Emissions Pathway however is not yet publicly disclosed.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a procedure that outlines the management of GHG emission and reductions plans. Regular review of metrics, risks and reduction opportunities are performed periodically. Carbon intensity metrics are updated periodically for both the Entity's plants and the Real Alloy business. These data are shared with senior management and relevant plant personnel.

CRITERION	RATING	COMMENT
		GHG-related environmental impacts are addressed through the environmental impacts registry as part of the Entity's Environmental Management System. Roles and responsibilities are defined to ensure the GHG management processes comply with both ASI and Real Alloy requirements.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity quantifies and discloses its Material air emissions through regulatory and sustainability reporting. The Entity operates emission control systems, conducts monitoring and maintenance programs, and reviews its air emissions plan at least every five years, most recently in 2024. More information is available in the Real Alloy Sustainability Report (page 18): https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf
6.2a-g Discharges to Water	Conformance	<p>The Entity has implemented site-specific water management plans, including stormwater, slug discharge, and sampling controls, with quarterly laboratory analyses confirming compliance. Process water is managed in a closed-loop cooling system, whilst only domestic wastewater and stormwater are discharged. Information on water use and discharges is available in the Real Alloy Sustainability Report on page 16: https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf</p> <p>The Entity also conducts regular inspections and maintains stormwater infrastructure to minimise environmental risks. Preventive measures and continuous monitoring support ongoing compliance with permit requirements and protection of water resources.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a Spill Prevention, Control, and Countermeasures (SPCC) Program, which is supported by risk assessments, scheduled inspections, preventive maintenance, and quarterly monitoring. Spill kits and response equipment are routinely inspected, employees receive annual training, and a spill log is maintained for incident tracking. The Entity's Emergency Response Plan addresses major events, including chlorine spill procedures, and all related plans and procedures are periodically reviewed and available on the Entity's intranet.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented a Spill Prevention, Control, and Countermeasures (SPCC) Program, which includes containment procedures, corrective actions, and notification of regulatory authorities. No significant Spills have been reported in recent years. Impact assessments, root causes, and remediation actions are publicly disclosed on an annual basis in the Real Alloy Sustainability Report on page 16, available at: https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has documented a Waste Management Plan with Hazardous and Non-Hazardous Waste streams identified, inventoried, and tracked using audit protocols. Environmental and health impacts of Waste are assessed through an aspects and impacts register, and the Entity applies the Waste Mitigation Hierarchy via practices such as magnetic metal recovery, pallet reuse, and recycling of cardboard

CRITERION	RATING	COMMENT
		<p>and Aluminium by-products, including the resale of recovered metals. Waste generation and disposal data are compiled and publicly disclosed in the Real Alloy Sustainability Report on page 18: https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf</p> <p>Compliance with applicable waste regulations is maintained through the regular reporting to relevant authorities.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity stores and manages Dross in controlled areas to prevent release and leachate. Dross is reprocessed to maximise Aluminium recovery, and treated residues are tracked through shipment records to recovery facilities. Alternatives to landfilling are reviewed annually, with most Dross directed to recovery rather than for disposal.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified, mapped, and assessed water withdrawal and use by source and type. All freshwater is supplied by municipal utilities, with consumption primarily for equipment cooling, sanitation, and cleaning purposes. Water use is tracked and reported regularly, and risks to Watersheds are considered not significant given the exclusive reliance on municipal supply and the limited process use.</p> <p>Annual disclosures of volumes are provided in the Real Alloy Sustainability Report, page 18: https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as both Environmental Aspect Impact Risk Assessments and water mapping indicate that water risks are not significant. As a result, no water management plans with time-bound targets have been implemented.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity conducted a Biodiversity and Ecosystem Services Risk and Impact Assessment in April 2025 via an independent consultancy. Using desktop analysis and ecological databases, the assessment mapped key habitat types and identified the potential presence of threatened and endangered species, with forests and wetlands noted as most significant.</p> <p>This review concluded that current operations are unlikely to significantly affect flora and fauna nor any Ecosystem Services due to the long-established industrial footprint of the Entity.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity and Ecosystem Services Risk and Impact Assessment confirmed there is no situation where the Entity contributes to or is likely to impact Ecosystem Services.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity and Ecosystem Services Risk and Impact Assessment confirmed there is no situation where the Entity contributes to or is likely to impact upon Biodiversity.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity and Ecosystem Services Risk and Impact Assessment confirmed there is no situation where the Entity contributes to or is likely to impact Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has conducted an Alien Species Risk Assessment to evaluate potential pathways for introduction and spread within its Area of Influence. The assessment identified risks such as vehicle movements, site disturbances, and unmanaged natural areas, and introduced mitigation practices to prevent the transfer of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Properties near nor in the Area of Influence of the Entity's facilities. No exploration or development of New Projects or Major Changes in World Heritage Properties is planned.
8.6a-d Protected Areas	Conformance	A review of both the USGS Protected Area online map and the Entity's Biodiversity and Ecosystem Services Risk and Impact Assessment confirms that there is no Protected Areas near the Entity's facility nor in its Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Real Alloy Code of Conduct and Ethics contains a commitment to respect Human Rights. This Code is communicated to all employees during 'onboarding' and is posting throughout the workplace. A Supplier Sustainability Policy also defines Human Rights principles that suppliers are expected to comply to.</p> <p>Both the Code of Conduct and Ethics and Supplier Sustainability Policy were reviewed in 2024 and are available at: https://realalloy.com/sustainability-solutions/</p> <p>Real Alloy has a defined Human Rights Due Diligence process that includes a risk and impact assessment using the UN Global Compact Self-Assessment to help identify potential impacts and mitigation measures to address them. No moderate or major adverse impacts were identified. Any contribution or causing of adverse effect on Human Rights would be identified in this assessment and remediation actions would be established and recorded as necessary.</p> <p>A mapping of Affected Populations and Organisations is available for both Facilities. Affected parties including employees, contractors, neighbouring businesses and the community are identified with their respective potential impacts, controls and engagements activities.</p>

CRITERION	RATING	COMMENT
		The Human Rights Due Diligence process however was not developed in consultation with and, where possible, with the participation of Affected Populations and Organisations. Whilst the Due Diligence identified actual and potential non-material impacts on Human Rights, there is no evidence that actions to prevent, mitigate and/or address have been planned.
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Real Alloy Code of Conduct and Ethics and the Anti-Discrimination and Anti-Harassment Policy contain commitments to women's rights. These commitments are consistent with the UN Convention on the Elimination of all Forms of Discrimination Against Women.</p> <p>The Anti-Discrimination and Harassment Policies include gender as a protected category from Discrimination or Harassment. Maternity leave is provided according to local labour rights regulations. A variety of programs and measures are in place to ensure and promote gender equity including a wages scale, awareness training, an equal opportunity report and a leadership development program. Women in the workplace statistics are communicated in the Real Alloy Sustainability Report.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity has reviewed the demographic data for the areas in which its operates and have not identified Indigenous People near the Facilities or that are affected by its operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as the Entity has reviewed the demographic data for the areas in which its operates and have not identified Indigenous People near the Facilities or that are affected by its 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 it has no New Projects or operations located on or near lands traditionally owned or under customary use by Indigenous Peoples and traditional communities, or Indigenous or traditional peoples that may be affected by its activities.
9.5a Cultural and Sacred Heritage - Identification	Conformance	A review undertaken by the Entity confirms that there are no sacred or cultural heritage sites and values within its Area of influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity as the review undertaken by the Entity confirms that there are no sacred or cultural heritage sites and values within its Area of influence.
9.6a-i Displacement	Not Applicable	The Entity has implemented a 'management of change' process that considers social impacts for Major Projects, with Due Diligence conducted by the legal department to assess potential displacement risks. The process is designed to ensure that such risks are identified, evaluated, and minimised as part of project planning and implementation.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity has developed a mapping of its Affected Populations and Organisations to develop a plan to engage and to ensure the prevention of any adverse impacts by establishing an open communication with external Stakeholders.</p> <p>The Entity engages with Communities including charitable giving, supporting local projects, and proactive relationships with police and emergency services. The Entity also established a policy to ensure that all charitable contributions, donations, sponsorships are aligned with the corporate social responsibility and business goals.</p> <p>There is no evidence however that the plan to address significant impacts on Affected Populations and Organisations was developed in consultation. Additionally, the latest version of the plan is not publicly disclosed.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Major Non-Conformance	<p>Whilst the Entity has developed a Supplier Sustainability Policy (Refer to: https://realalloy.com/sustainability-solutions/), there is no evidence that it has established a management system to assess risk-based Due Diligence according to the OECD Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	<p>As there is no evidence that it has established a management system to assess risk-based Due Diligence according to the OECD Guidance, a strategy to respond to risks has also not been developed.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	<p>As there is no evidence that it has established a management system to assess risk-based Due Diligence according to the OECD Guidance, a strategy to respond to risks has also not been developed.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	<p>As there is no evidence that it has established a management system to assess risk-based Due Diligence according to the OECD Guidance, the Entity does currently annually report on its risk-based Supply Chain Due Diligence.</p>
9.9 Security practice	Conformance	<p>The Entity's facilities do not hire security personnel on site and have a written procedure in case of trespassing or other violent situations in the site's emergency action plan that includes involvement of local police departments.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity's Code of Conduct and Ethics includes statements about the respect of the right to join or not join a Union and where Workers are represented by a legally recognised Union, and a commitment to establish a constructive dialogue with representatives.</p> <p>Interviews with Workers undertaken during the Audit demonstrated that all hourly Workers feel free to join or not a Union and no pressure or coercion is placed on any Worker.</p> <p>The Entity's Supplier Sustainability Policy also includes a statement on its suppliers to respect the rights of Freedom of Association.</p>

CRITERION	RATING	COMMENT
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 there is no legal restriction to the right of Freedom of Association and Collective Bargaining in the United States.
10.2a Child Labour	Conformance	<p>The Entity's Code of Conduct and Ethics states that it prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of Slavery and prohibits the use of Child Labour.</p> <p>The minimum employment age is 18 years and processes are implemented to ensure no person under 18 years is employed.</p> <p>During the Audit, the site walkover and interviews with Workers, it was confirmed that no Worker or contractor under 18 years of age was witnessed nor any suspicion of minor presence on site.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity's Code of Conduct and Ethics states that it prohibits the use of all forms of Forced Labour including Human Trafficking and modern forms of Slavery. Recruitment agencies are not used by the Entity. No deposit is made from employees or contractors according to the onboarding process and Worker interviews. The employment application form used only requests candidates for copies of their original IDs, diplomas and other relevant documents, and not original documents.</p> <p>The Entity does not provide housing or any other similar services to employees to restrict their freedom of movement. During the Audit, the site walkover and interviews with Workers, it was confirmed that there was no activity that may indicate the presence of Forced Labour.</p> <p>The Entity has published a Child and Forced Labor Statement, available at: https://realalloy.com/sustainability-solutions</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has established anti-Discrimination policies that apply to all Workers and has established a non-Discrimination mechanism. The Supplier Sustainability Policy requires all suppliers to respect Real Alloy values, including non-Discrimination.</p> <p>Discrimination and Harassment prohibition are stated in the Entity's Code of Conduct and Ethics, which is reviewed by all employees during orientation and available online at: https://realalloy.com/sustainability-solutions/</p> <p>A 'hotline' is available by phone or on the Entity's website for all employees to report any actual or suspicion of discrimination, available at: https://realalloy.com/contact/</p> <p>Appraisals of job performance is performed using a documented Performance Assessment mechanism.</p>
10.5 Communication and engagement	Conformance	<p>The Entity's Code of Conduct and Ethics contains a non-retaliation statement. Anti-Discrimination policies also have reporting of unlawful conduct and non-retaliation mechanism.</p> <p>Periodic meetings with employees are implemented to raise concerns from all employees. All concerns, issues or complaints raised by Workers are recorded and investigated if needed. Employees are encouraged to raise issues to direct supervisors, managers or senior managers.</p>

CRITERION	RATING	COMMENT
		<p>A Compliance Hotline is also in place for complaints and 'whistleblowing'. Hotline phone reporting or online reporting is available at: www.realalloy.ethicspoint.com</p> <p>During the Audit, the site walkover and interviews with Workers, it was confirmed that there is open communication between Workers and management.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established two Anti-Discrimination Policies that apply to all Workers and establish an anti-Harassment mechanism, which are in accordance with local labour regulations. A Disciplinary Procedure is established and applies to all employees. This procedure defines rules pertaining to employee conduct, performance and responsibilities and how verbal, written warnings, suspension or terminations are applied for non-Union workers.</p> <p>Violence and Harassment hazards are identified and considered in the management of Occupational Health and Safety.</p>
10.7a-c Remuneration	Conformance	<p>Hourly employee wages are defined by established and documented scales that considers several factors, including benchmarking from similar local employers.</p> <p>Salary employee wages are established by corporate in a set of documented grades that also consider several factors, including benchmarking from similar local employers. Terms and conditions of employment are defined clearly during the 'onboarding' process.</p> <p>A time keeping system calculates work time and Overtime. Corporate salary grades and hourly scales are typically above local minimum wages.</p> <p>Any work undertaken beyond 40 hours in a week are paid with a premium.</p>
10.8a-c Working Time	Conformance	<p>Office employees work a standard Monday to Friday for 40-hour week.</p> <p>Plant Workers work on shift depends on each Facility's situation. The Entity has established a Sick Leave Policy, Attendance Policy and Vacation Policy that establish annual leave and sick leave entitlements. Local public holidays and other labour laws are also respected.</p> <p>Employees work on shifts with schedules agreed during the hiring process. Local regulations are adhered to, and Workers have appropriate rest days and Overtime beyond the agreed schedule is always voluntary.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity's Code of Conduct and Ethics includes the rights of Workers regarding Discrimination, Freedom of Association and reporting. The Code is delivered to employees during the 'onboarding' process and there is evidence of employees signing that they received it. All Human Resources policies including workplace anti-Discrimination and Harassment Policy, Vacation Policy, Sick Leave Policy are also communicated during the 'onboarding' process.</p> <p>Mandated posting of local labour rights that include minimum wages, the right of refusal, Overtime and working hours, equal pay, and compensation, is undertaken in conspicuous places throughout the workplace premises.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established a comprehensive Occupational Health and Safety (OH&S) Management System, supported by documented processes and standards that address workplace hazards and risks. Risk assessments are integrated into daily operations, with hazard identification included in work instructions across all functions. Training programs are delivered through structured processes, and records are maintained to demonstrate completion. All programs are aligned with applicable regulatory requirements.</p> <p>Continuous improvement is achieved through assessment tools, strategic action plans, and corporate audits, which provide oversight and ensure accountability. Regular site observations confirm that Health and Safety practices are effectively implemented and that employees are aware of the risks associated with their tasks, contributing to a strong culture of safety and engagement.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity reviews its OH&S Management System at least every five years or whenever changes in site activities may affect OH&S risks. The effectiveness of the system is publicly disclosed in the Real Alloy Sustainability Report. Several leading and lagging indicators are monitored, including safety observations, corrective and preventive action follow-up, near-miss and Safe-or-Stop reports, safety training delivered, recordable injuries and illnesses rate (IIR), and days away rate (DAWR). Results for these indicators as well as benchmarking against the Bureau of Labor Statistics (BLS) are published in the Real Alloy Sustainability Report on page 22, available at: https://realalloy.com/wp-content/uploads/2025/05/2024-REAL-ALLOY-Sustainability-Report-1.pdf</p> <p>All indicators are reviewed quarterly at the corporate level as well as safety achievements. Improvement action plans are implemented when needed to address specific performance issues.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established regular meetings to address Health and Safety concerns, where discussions and action items are documented and reviewed for accountability. Oversight is provided through a Central Safety Committee, whilst employees remain engaged through daily communications, incident reviews, and open channels including suggestion mechanisms to raise concerns and suggestions.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 November 2022	Initial Certification Audit – Full Certification

