

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Waldaschaff Automotive Mexico S. de R.L. de C.V.

CERTIFICATE NUMBER
457

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
DQS CFS

DATE OF ISSUE
8 APRIL 2025

DATE OF EXPIRY
7 APRIL 2026

CERTIFIED SINCE
8 APRIL 2025

AUTHORISED BY

CERTIFICATION SCOPE

Development and production of
Lightweight Systems, Steel and
Aluminum Components and Parts
at Waldaschaff Automotive, San
Pedro del Monte, León Guanajuato,
Mexico.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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*

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Waldaschaff Automotive Mexico S. de R.L. de C.V.
ENTITY NAME	Waldaschaff Automotive Mexico S. de R.L. de C.V.
CERTIFICATION SCOPE	Development and production of Lightweight Systems, Steel and Aluminum Components and Parts at Waldaschaff Automotive, San Pedro del Monte, León Guanajuato, Mexico.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Other manufacturing or sale of products containing Aluminium
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (28 – 31 January 2025)Surveillance Audit (11 – 12 August 2025)
AUDIT FIRM	DQS CFS
AUDIT DATE	<ul style="list-style-type: none">28 – 31 January 2025 (Initial Certification Audit)11 – 12 August 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 March 2025 (Initial Certification Audit)3 October 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (28 – 31 January 2025)</u></p> <p>The Audit Scope covered the development and production of Lightweight Systems, Steel and Aluminum Components and Parts at Waldaschaff Automotive, located in San Pedro del Monte, León Guanajuato, Mexico.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Other manufacturing or sale of products containing Aluminium <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (11 – 12 August 2025)</u></p> <p>The Audit Scope covered the development and production of Lightweight Systems, Steel and Aluminum Components and Parts at Waldaschaff Automotive, located in San Pedro del Monte, León Guanajuato, Mexico.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Other manufacturing or sale of products containing Aluminium <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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.

CERTIFICATION PERIOD

8 April 2025 – 7 April 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

7 April 2026

CERTIFICATE NUMBER

457



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 Entity, Waldaschaff Automotive Mexico, commenced production in 2017 within an industrial park at Carretera León - Cuerámara 3202, int 101, San Pedro del Monte, León, Guanajuato, México. The Entity was incorporated as a subsidiary of the Lungyun Group (China) in 2021. The Entity produces lightweight systems of steel and Aluminium components and parts for the automotive industry, which include battery cases, crash management systems, structural components, door components and tailgate structures.

The Entity currently employs approximately 250 employees with most of these employees residing in the local area. The Entity remains in regular and close contact with these surrounding communities.

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	Low	Low	Low	LOW
RISKS	Low	Low	Low	LOW
PERFORMANCE	Low	Low	Low	LOW
OVERALL				LOW

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has implemented an Integrated Management System to maintain awareness of and ensure Compliance with Applicable Law and seeks to understand and conform with relevant aspects of customary law where relevant. The Entity maintains an up to date 'Matrix of Legal Requirements for Safety and Environment' and a list of applicable Labour Laws.</p> <p>During the Audit, it was noted, however, that the 'Matrix of Legal Requirements for Safety and Environment' still contains some requirements which are not fully implemented. Relevant key customer requirements including the Entity's Supplier Code of Conduct and Responsible Sourcing Standards have not been formally incorporated in the Entity's register.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity is firmly dedicated to combating Corruption in all its forms, including Extortion and Bribery, and adheres strictly to Applicable Laws and international standards. Key anti-Corruption requirements are detailed in the Entity's Code of Conduct, which can be accessed at: https://www.waldaschaffmx.com/conduct.html (refer to Chapter D – Ethics)</p> <p>Additionally, the Entity has developed anti-Corruption related Policies, available at https://waldaschaffmx.com/resolution.html</p> <p>The primary goal of these Policies is to prevent actions that could compromise business integrity or contravene the Code of Conduct. Examples of such actions include offering or accepting gifts, invitations, or other incentives that may unduly influence business decisions or create conflicts of interest.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has a local Code of Conduct available which includes principles relevant to environmental, social and governance performance and is communicated to employees and contractors. Refer to: https://waldaschaffmx.com/conduct.html</p> <p>A Supplier Code of Conduct has also been developed and has been distributed to suppliers. Refer to: https://waldaschaffmx.com/conductsupplier.html</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented a dedicated Integrated Management System Policy, encompassing key aspects such as environmental protection, Health and Safety, as well as social responsibility. Further details can be found at: https://waldaschaffmx.com/sgi.html</p> <p>Additionally, the Entity operates under several other important Policies, including the Policy on Conflict of Interest, the Anti-Bribery and Corruption Policy, the Environment, Health, Safety and Security (EHS&S) Policy, the Policy on the Resolution of Concerns and the Policy for Identification of Hazards and Evaluation of Environmental Risks and Impacts.</p> <p>These Policies are fully endorsed by senior management, who demonstrate their commitment by providing the necessary resources to uphold and implement them effectively.</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity's Human Resources Manager is the nominated senior Management Representative whom leads the implementation and communication of the Policies. The resources needed to establish, implement, maintain and improve the Management Systems required as per ASI Performance Standard requirements are considered as sufficient.
2.3a Environmental and Social Management Systems – Environmental	Minor Non-Conformance	The Entity is certified under ISO 14001, with a certificate issued by AENOR, valid until March 2027. Refer to: https://www.waldaschaffmx.com/iso14001.html Whilst the Entity's Environmental Management System is certified according to ISO 14001, conformance to the Standard cannot be currently confirmed during the ASI Audit, several environment-related operational issues were noted that could be construed as non-conformance to some requirements of the ISO 14001 Standard.
2.3b Environmental and Social Management Systems – Social	Conformance	Various Management System documents address social aspects at the Entity. A 'SWOT' analysis including an action plan has been developed by the Entity to address social aspects in detail and to adapt processes. As a part of the Entity's senior management review process, social aspects have been incorporated into the EHS aspect of the review. Three Responsible Business Alliance (RBA) Audits have been recently completed at the Entity, where it had received consistent overall high RBA Audit scores. Refer to: https://www.waldaschaffmx.com/rba.html
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has established and published a Supplier Code of Conduct covering environmental, social and governance issues, consistent with the Principles of the ASI Performance Standard. Refer to: https://www.waldaschaffmx.com/conductsupplier.html This Code forms an inherent aspect of all contractual agreements with the Entity's suppliers. An accompanying supplier selection and screening procedure applies for all new suppliers and includes sustainability requirements for all suppliers. However, there remains a lack of implementation in that there was no evidence available at the time of the Audit as to whether the responsible sourcing framework established by the Entity is being effectively used by both the Entity and its suppliers.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity is not currently implementing any New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as the Entity is not currently implementing any New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has established site-specific emergency response measures, including an Emergency Response Plan (ERP). Refer to: https://www.waldaschaffmx.com/emergency.html In addition to the ERP, the Entity has developed and implemented an Emergency Response Procedure, Emergency Drills Reports, Emergency Response Evaluations, and a Contingency Plan. All documents are systematically reviewed on a regular basis, at least every five years.

CRITERION	RATING	COMMENT
		Should there be any changes to the business that affect the nature or scale of emergency incident risks, these documents are promptly updated. The Emergency Response Plan and associated procedures are also reviewed whenever a potential control gap is identified. Relevant scenarios and procedures are tested frequently.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Contingency and Resilience Plan, ensuring that it is well-prepared to handle potential risks effectively. In addition, the Entity has developed a Policy entitled 'Social and Environmental Process Policy for Critical Scenarios' (Política de Proceso Social y Ambiental para Escenarios Críticos) which defines various scenarios and corresponding actions to address situations in which operations may need to be suspended or significantly altered due to factors beyond the Entity's control. It also takes into consideration Material adverse impacts on Environmental, Social and Governance (ESG) factors.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a Policy entitled 'Social and Environmental Process Policy for Critical Scenarios' (Política de Proceso Social y Ambiental para Escenarios Críticos) which defines various scenarios and corresponding actions to address situations in which operations may be subject to any merger and acquisition activities.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a Policy entitled 'Social and Environmental Process Policy for Critical Scenarios' (Política de Proceso Social y Ambiental para Escenarios Críticos) which defines various scenarios and corresponding actions to address situations in which operations may be subject to any closure and/or decommissioning activities.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published the Integrated Annual Report 2024 available at: https://waldaschaffmx.com/index.html#client</p> <p>This Report provides a comprehensive overview of the company's profile, governance, performance, sustainability efforts, and transparency. It details the Entity's history, structure, and policies, highlighting its commitment to legal compliance, values and Human Rights.</p> <p>Performance indicators address environmental, health, safety, and social aspects, with long-term goals for reducing energy consumption, water usage and CO₂ emissions. The Entity's Material environmental, social and economic impacts related to Principles in the ASI Performance Standard are also disclosed.</p>
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed (at: https://waldaschaffmx.com/index.html) that no Material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law payments had been made.
3.3a-c Payments to Governments	Conformance	The Entity has implemented an Anti-Bribery and Anti-Corruption Policy, which outlines all requirements. Whilst public payments to Governments, building on existing audit and assurance systems, have not been published, the Entity has made no beneficiaries of financial and in-kind political contributions. Further details on payments to

CRITERION	RATING	COMMENT
		Government are available in the financial report of its parent company, Lungyun Group.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity outlines its Complaints Resolution Mechanism in its Resolution of Concerns Policy. Refer to: https://www.waldaschaffmx.com/resolution.html</p> <p>This Policy provides a framework for both employees and external Stakeholders. To date, no external complaints have been received.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has developed a basic Life Cycle Assessment (LCA) that considers Scope 1 and Scope 2 CO ₂ emissions types and a matrix of environmental aspects has been created for its major Products. However, the current LCA prepared by the Entity does not include Scope 3 emissions and has been approximated only based on one major Product line for which Aluminium is considered or used.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	A summary of the Entity's LCA can be made available upon request.
4.2 Product Design	Conformance	The Entity takes customer specifications relating to the design of the Products, and where possible considers efficiency and recyclability concepts, however input by the Entity into overall Product design is limited.
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	<p>Whilst the Entity has a general waste Management System in place and operational on site, the commitment to achieving the target of 100% Scrap collection, recycling, and/or re-use requires further refinement. During the on-site inspection as part of the Audit, it was noticed that Aluminium Scrap was mixed with other waste in the outside area, and in residual waste bins which indicates the need for better implementation.</p> <p>The separation of Aluminium alloys and grades for recycling has also not been undertaken effectively, with two alloys not being separated.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity produces parts (as a Tier 1 supplier) to automotive customers, and once assembled, the customer and end user is considered as the recycler according to their internal processes.</p> <p>The Entity, however, does have a limited role in the design of recyclable components and/or targets on recycled content, the use of Recycled Aluminium and Scrap recycling.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity produces parts (as a Tier 1 supplier) to automotive customers, and once assembled, the customer and end user is considered as the recycler according to their internal processes.</p> <p>The Entity however does have a limited role in the design of recyclable components and/or targets on recycled content, the use of Recycled Aluminium and Scrap recycling.</p>
5. GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has accounted for its Greenhouse Gas (GHG) emissions for Scopes 1, 2 and 3 in its 'Emissions Calculation Report Scopes 1, 2 and 3', which are verified by an external Third Party. Scopes 1 and 2 GHG emissions data and energy use data are reported in the 2024 Sustainability Report: https://waldaschaffmx.com/index.html#list-home</p> <p>At the time of the Audit however, the emissions from 2023 are not yet published in the annual Sustainability Report.</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	Major Non-Conformance	<p>The Entity has not developed a formal GHG Emissions Reduction Plan to ensure a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario and has not finalised the ASI GHG Pathways Calculation Tool. As a result, no Intermediate Targets covering a period no greater than five years exist, and no baseline year has been established.</p> <p>The Entity is also currently unable to demonstrate that its GHG emissions intensity reduction performance is in alignment with its ASI method-derived GHG Emissions.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Major Non-Conformance	The Entity has not developed a formal GHG Emissions Reduction Plan to ensure a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario and has not used the ASI GHG Pathways Calculation Tool. As a result, not Intermediate Targets covering a period no greater than five years exist, and no baseline year has been established.
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has implemented a holistic Management System that considered energy and emission controls, which is supported by procedures and operating controls to support emissions reductions over time.</p> <p>However, the lack of a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario means that the current GHG emissions management framework remains insufficient.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity monitors and publicly discloses its Material CO₂ emissions from its operations on a monthly basis. An annual emissions report (latest version - January 2025) has been prepared, detailing the emission sources within the plant and key data from this analysis are disclosed in the 2024 Sustainability Report: https://waldaschaffmx.com/index.html#list-home</p> <p>At present, no specific air quality limits are applicable to the Entity.</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	The Entity identifies, evaluates, and quantifies Material Discharges to Water resulting from its operations. The Entity periodically monitors the effectiveness of its control plans and conducts regular reviews. In the event of Major Changes or instances of non-conformance the Entity publicly discloses its pollutant discharge information plan in the 2024 Sustainability Report at: https://waldaschaffmx.com/index.html#list-home
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has analysed possible emergency situations relating to Spills and Leakages which have been incorporated into the Entity's Emergency Response Plan. The Entity logs and identifies any Spill-related incidents in its EHS KPI Reporting Sheet. In 2024 no significant Spill-related emergency occurred.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Environmental incidents including Spills and Leakages with negative environmental impact are presented as part of the KPI's in the 2024 Sustainability Report, page 14: https://waldaschaffmx.com/index.html#list-home The Entity, however, will disclose to Affected Populations and Organisations the volume, type and potential impact of Material Spills and Leakages as soon as practicable following an incident.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	There are mechanisms for identifying, tracking and monitoring the Waste generated from the plant, through the use of both the Entity's Waste Management Procedure and Procedure to Audit Waste Suppliers. Additionally, the Entity's Matrix of Environmental Aspects in which one of the environmental aspects includes the generation of Hazardous and Non-Hazardous Waste, there are internal and EHS Process Indicators that reflect the monitoring of the generation of Hazardous and Non-Hazardous Waste. Data relating to Hazardous and Non-Hazardous Waste are available on page 17 of the 2024 Sustainability Report: https://waldaschaffmx.com/index.html#list-home The Entity, however, has not set any realistic targets nor established related actions with respect to reducing Hazardous Waste quantities. Additionally, potential Material impacts to human well-being and the environment of these Wastes have not been assessed.
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 identified and publicly disclosed its water withdrawal on an annual basis. The usage of water can be found in the 2024 Sustainability Report: https://waldaschaffmx.com/index.html#list-home The Entity's impacts to the Watershed are considered very low as most water is used on site for sanitary purposes only.

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as the water-related risk has been assessed as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has assessed the risk to, and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within its Area of Influence. The Entity is located within the Vynmsa León Industrial Park, and therefore the Biodiversity risk is considered as low.</p> <p>Additionally, the Entity however has considered Biodiversity in its risk assessment of environmental aspects which has been assessed as low.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment determined there was no significant risk to Priority Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment determined there was no significant risk to Biodiversity or Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment determined there was no significant risk to Biodiversity or Ecosystem Services.
8.4 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. The ' <i>Plantation Plan from Industrial Park for Waldaschaff Area</i> ' references native species that have been planted in the immediate region of the Entity.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity has committed publicly on its webpage that it does not explore or develop New Projects or make Major Changes in World Heritage Properties, with the following sentence: "Waldaschaff Automotive Mexico S.A. se compromete a no realizar ningún nuevo proyecto dentro o en las proximidades de los sitios del Patrimonio Mundial." (https://waldaschaffmx.com)</p> <p>The Entity has no existing operations in World Heritage Properties.</p>
8.6a-d Protected Areas	Conformance	<p>The Entity has assessed the region of Leon and the State of Guanajuato for the presence of Protected Areas. There are no Protected Areas within the Entity's Area of Influence. Refer to the following for further information on Protected Areas:</p> <p>https://smaot.guanajuato.gob.mx/sitio/areas-naturales-protegidas</p>
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		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights. A gender-responsive Human Rights Due Diligence process is considered in the Entity's Policy on Risk Management (Gestión de riesgos), referenced in various chapters of the Code of Conduct (https://waldaschaffmx.com/conduct.html) and in the Supplier Code of Conduct (https://waldaschaffmx.com/conductsupplier.html).</p> <p>Whilst a Due Diligence process is in place, there are still some deficiencies including consideration of the full UN Guiding Principles for Business and Human rights as well as any explicit consideration of people with disability.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has implemented a program which promotes gender equity and women's empowerment in employment practices, training opportunities, the awarding of contracts, processes of engagement and management activities. Whilst basic gender-related data are available in the 2024 Sustainability Report, the Entity, however, has not publicly disclosed the performance of its gender equity initiatives.</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.</p>
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, nor features of cultural or sacred heritage in the Entity's Area of Influence.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, nor features of cultural or sacred heritage in the Entity's Area of Influence.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity as no resettlement activities were required.</p>
9.7a-h Affected Populations and Organisations	Not Applicable	<p>This Criterion is not applicable to the Entity, as it is located within the Vynmsa León Industrial Park and is not located near any potentially Affected Populations and Organisations.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Major Non-Conformance	<p>Whilst the Entity has implemented a supplier selection process and a supplier evaluation process, it has not implemented a formal risk-based Due Diligence assessment framework in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and</p>

CRITERION	RATING	COMMENT
		High-Risk Areas (OECD Guidance). Additionally, the Entity's supplier Code of Conduct currently only contains 3TG as critical materials and does not include Aluminium (nor steel).
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is currently not applicable to the Entity, as it has not established an appropriate Management System that could appropriately address the requirements of this Criterion.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is currently not applicable to the Entity, as it has not established an appropriate management system that could appropriately address the requirements of this Criterion.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is currently not applicable to the Entity, as it has not established an appropriate management system that could appropriately address the requirements of this Criterion.
9.9 Security practice	Conformance	<p>The Entity has established Policies and procedures that reflect its dedication to Human Rights relating to security activities. These Policies and procedures have been effectively communicated to personnel and other Stakeholders through various channels, including web pages, office posters, intranet pages, letters, contracts, and Sustainability or Annual Reports. The Human Rights Due Diligence process at the Entity specifically includes a thorough consideration of security risks.</p> <p>An up-to-date risk assessment for impacts associated with security activities is conducted regularly. Security personnel receive training in Human Rights, with evidence cited including training materials, attendance sheets, and certificates.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	There is no Union presence at the Entity currently, however it is open to a Worker decision to reconsider this in future. The Entity's Code of Ethics and Conduct states that it respects the right of Workers to form and join Trade Unions of their choice, participate in Collective Bargaining and peaceful assemblies, and the right of Workers to refrain from participating in such activities is also respected. Workers or their representatives will be able to communicate openly with management, as well as share with management their ideas and concerns regarding working conditions and management practices, without fear of Discrimination, retaliation, intimidation or Harassment.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in a country (Mexico) where the right to Freedom of Association and Collective Bargaining are not restricted.
10.2a Child Labour	Conformance	The Entity only offers employment contracts to candidates that demonstrate they are 18 years of age or older. The Entity's Code of Conduct states that Child Labour will not be used at any stage of

CRITERION	RATING	COMMENT
		<p>manufacturing. The term 'child' includes any person under the age of 15, under the age at which compulsory schooling ends, or under the minimum working age in the country, whichever is greater.</p> <p>More details are defined in the Entity's Social Responsibility Policy and Commitment to the Human Rights of Waldaschaff México and Its Supply Chain, available at: https://www.waldaschaffmx.com/sgi.html</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has published its commitment in respect to Forced Labour in their ethical conduct in its Social Responsibility Policy and Commitment to the Human Rights of Waldaschaff México and Its Supply Chain, available at: https://www.waldaschaffmx.com</p> <p>The Entity is committed to ethical labour practices, ensuring the rights and freedoms of all Workers are upheld. The Entity strictly prohibits the use of Forced Labour, bonded labour, labour exploitation, involuntary or exploitative labour in prison, Slavery, or Human Trafficking. This includes any form of transporting, harbouring, hiring, transferring, or coercing individuals through threats, force, abduction, or fraud to obtain work or services.</p> <p>The Entity has also publicly disclosed an annual Modern Slavery Statement, available at: https://www.waldaschaffmx.com/accionesparapreveniresclavitud.html</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities and 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. Interviews during the Audit confirmed that there is no Discrimination evident. The Entity's commitment and approach to non-Discrimination can be found in the Code of Ethics, available at: https://waldaschaffmx.com/conduct.html</p> <p>To date, no complaint in respect to Discrimination was noted. This was also confirmed in Worker interviews undertaken during the Audit.</p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with Workers regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Violence and Harassment.</p> <p>Worker interviews undertaken during the Audit confirmed that open communication channels are in place at the Entity.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented both a Workplace Harassment Policy and a Non-Violence at Work Policy which are available at: https://waldaschaffmx.com/noviolenca.html</p> <p>Both Policies affirm the objective to establish rules and procedures to provide a safe, non-violent work environment and to guarantee the peace of mind of Workers. The Entity has also implemented a Disciplinary Action Policy and Concern Resolution Policy to support this process.</p>
10.7a-c Remuneration	Minor Non-Conformance	<p>All Workers have a written employment contract with terms and conditions of employment in a basic, understandable format. The</p>

CRITERION	RATING	COMMENT
		<p>Entity facilitates wage payments that are timely, in legal currency and fully documented.</p> <p>Whilst on average, the Entity pays wages well above the minimum legal wage for the Guanajuato Province, it is considered below that of a living wage considered appropriate for this region. Additionally, there is no payment of an additional 25% loading where more than 40 hours per week are worked.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity generally complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. Also, Workers have at a minimum, an average of one day off per seven-day period. Due to the general Working Time model of four days of 12 hours (followed by a three-day working week) an eight hours per day working shift on average over a six-month period cannot be attained.</p> <p>Previous RBA audits undertaken at the Entity identified that some employees were working excessive hours and/or prolonged periods without an appropriate number of days off. There were also isolated cases noted during the Audit of Overtime hours not being noted in the Entity's systems.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has developed an appropriate Code of Conduct and associated procedures and other documentation to protect the rights of Workers and Contractors, the appropriateness of training and communication of the Code is considered sufficient to ensure that all Workers and Contractors have been informed, understand and are aware fully of their rights when on site.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity holds a valid ISO 45001 certification. Refer to: https://waldaschaffmx.com/iso45001.html</p> <p>It has implemented a comprehensive, documented Occupational Health and Safety (OH&S) Management System that applies to all Workers and Visitors and encompasses key components including organisational context, leadership and Worker participation, planning, support, operation, performance evaluation, and continuous improvement. The Environmental, Health, and Safety (EHS) Policy is publicly available at: https://www.waldaschaffmx.com/sgi.html</p> <p>During the recent Audit site walkover, several situations were again noted that indicated that the Entity's OH&S operational controls were not being adequately implemented. These included (but are not limited to) a lack of Lock Out Tag Out, electrical risks, open electrical cabinets, unsecured cabling, and unguarded drilling machine, gas cylinders not secured by chain, incorrectly labelled chemicals, safety labels not presented in the local language (Spanish), protection of high pressure valves not fully installed, and some Personal Protective Equipment (PPE) non-conformities.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity undertakes a formal management review every six months. Review of the record of management reviews cited during the Audit demonstrated the reviews are comprehensive. Key Performance Indicators (KPI) on Health and Safety performance are disclosed in the 2024 Sustainability Report: https://waldaschaffmx.com/index.html#list-home</p>

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11.2 Employee engagement on Health and Safety	Minor Non-Conformance	<p>The Entity has established an Environmental, Health and Safety (EHS) Committee, which meets every three months.</p> <p>However, the Committee is currently deemed as ineffective as meetings have not occurred as scheduled, corrective actions and inspections are not updated and tracked effectively, and the communication of outcomes from Committee meetings is both inconsistent and incomplete.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	8 April 2025	Initial Certification Audit – Provisional Certification
1	20 October 2025	Surveillance Audit