

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# HAL Aluminum Mexico S.A. de C.V.

CERTIFICATE NUMBER  
**514**

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

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

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

DATE OF ISSUE  
**3 DECEMBER 2025**

DATE OF EXPIRY  
**2 DECEMBER 2028**

CERTIFIED SINCE  
**3 DECEMBER 2025**

## AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'Jhal'.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

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

## CERTIFICATION SCOPE

Plants 1 and 2 of the Hal Aluminum Mexico S.A. de C.V. facility, located in Guanajuato Mexico which undertakes Aluminium High Pressure Die Casting for the manufacture of parts used in the automotive industry.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	HAL ALUMINUM MEXICO S.A. DE C.V.
ENTITY NAME	HAL Aluminum Mexico S.A. de C.V.
CERTIFICATION SCOPE	Plants 1 and 2 of the HAL Aluminum Mexico S.A. de C.V. facility, located in Guanajuato Mexico which undertakes Aluminium High Pressure Die Casting for the manufacture of parts used in the automotive industry.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3.1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>22 – 25 September 2025</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 November 2025</li></ul>
AUDIT SCOPE	<p>The Audit Scope covers all activities relating to Plants 1 and 2 of the Hal Aluminum Mexico S.A. de C.V. facility, located in Guanajuato Mexico which undertakes Aluminium High Pressure Die Casting for the manufacture of parts used in the automotive industry.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul> <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- ✓ 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	3 December 2025 – 2 December 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	3 December 2026
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CERTIFICATE NUMBER	515
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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

HAL Aluminum México S.A. de C.V. (the ‘Entity’) is a subsidiary of the Japanese company Hiroshima Aluminum Industry Co., Ltd., and was established in Mexico in 2010. It is located within the Santa Fe Industrial Park, Puerto Interior, in the municipality of Silao, Guanajuato, where it operates in a strategic region for the automotive sector, with two production units known as HAL 1 and HAL 2. Its operations are focused on Aluminium High Pressure Die Casting, producing components for the automotive industry. Additionally, it incorporates machining and assembly processes, ensuring compliance with strict technical and quality standards required by the industry.

The Entity employs advanced technologies in High Pressure Die Casting, precision machining, and “near net shape” processes, which reduce rework and waste, increasing production efficiency. The Entity holds IATF 16949 certification for quality management and ISO 14001 for environmental management. It currently employs over 1,000 personnel across the two Plants which makes the Entity a significant contributor to economic investment and job creation in the State of Guanajuato, positioning itself as a reference supplier of Aluminium components for automotive manufacturers. The Entity considers itself as a critical link in the automotive production chain in Mexico, contributing both to regional industrial development and the strengthening of Japanese casting technologies in the Latin American market.

## MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	Medium	MEDIUM
<b>RISKS</b>	Medium	Medium	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>	MEDIUM			

## 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. The Entity has implemented a governance framework for business ethics and compliance, and training is delivered to relevant personnel on a regular basis.
1.2 Anti-Corruption	Conformance	<p>The Entity combats Corruption in all its forms, including Extortion and Bribery, in accordance with applicable legislation and current international standards, through the implementation of the Entity's Anti-Corruption Policy, available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section').</p> <p>The Entity hires an external auditor annually to review its financial transactions and has a reporting channel available to all Stakeholders.</p>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles relevant to environmental, social, and governance performance, available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section'). The Entity demonstrates that all Workers receive training on the Code of Conduct during the new Worker onboarding process, as well as annually during compliance campaigns.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented Policies consistent with environmental, social and governance practices approved by Senior Operations Management. The Entity disseminates information internally through the intranet, boards, and employee badges and externally at: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> (link on the main page).
2.2a-c Leadership	Conformance	The Entity's senior management has demonstrated leadership and commitment to the Integrated Management System and appointed a Management Representative. This role has the authority to implement, communicate and guarantee all requirements, standards and procedures linked to the implementation of the ASI Performance Standard, including Environmental, Social and Governance Policies.
2.3a Environmental and Social Management Systems – Environmental	Minor Non-Conformance	The Entity has documented and locally implemented an integrated Environmental Management System and holds a valid ISO 14001 Certificate. There are however deficiencies in the identification and control of significant environmental aspects and impacts.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a documented Social Management System, developed according to regional and corporate guidelines. Periodic monitoring is undertaken at both the facility and regional levels.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented and maintains a Supplier Sustainability Policy that addresses environmental, social, and governance issues. The Policy has been communicated to all relevant suppliers, and is

CRITERION	RATING	COMMENT
		available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the Facility.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the Facility.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Planning Management process, establishing a Contingency Plan with well-defined scenarios, in collaboration with potentially affected Stakeholder groups. The Entity has also conducted comprehensive environmental and occupational safety planning exercises. Refer to: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).
2.8a-d Suspended Operations	Conformance	The Entity has developed a Resilience Plan for a potential future operational suspension. The Plan aims to ensure the Entity's ability to respond to operational suspensions while minimising economic, social, and environmental impacts. The Contingency Plan is available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed a process for assessing potential risks, including ESG risks, in Mergers or Acquisitions. However, no Mergers or Acquisitions have occurred recently, nor are currently planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social, and governance issues in its planning and Due Diligence processes. Whilst closure, decommissioning, and divestments are not managed on a local level, the Entity however has implemented a process and procedure. No plan for closure, decommissioning, or divestment of the Entity was noted during the Audit.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and Material on environmental, social and economic impacts in its Sustainability Report 2024, available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity discloses information on Material fines, judgments, penalties, and non-monetary sanctions for non-compliance with Applicable Law if and should they occur. A technical report is issued annually with information on all financial operations; the most recent was issued in May 2025 and validated by an international auditing firm. This technical document is available for download at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).</p> <p>The Entity's Sustainability Report 2024 (page 26) states that it has not received any fines or non-compliances.</p>
3.3a-c Payments to Governments	Conformance	The Entity pays taxes appropriately, as evidenced by the debt clearance certificates issued by each unit's federal, state and municipal Governments. The Entity publicly discloses payments to Governments based on existing auditing and assurance systems,

CRITERION	RATING	COMMENT
		<p>which in this context applies to the declaration of all amounts paid as taxes and mandatory fees, as provided for by Mexican law. A summary of this information is available at:</p> <p><a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established a Transparency Hotline that can be accessed on the Entity's website, bulletin boards, and intranet. Direct and indirect Workers, suppliers, the community and other Stakeholders may anonymously submit reports to the Transparency Channel and indicate how they wish to be contacted (via phone: 01 800 890 90 72; E-mail: <a href="mailto:privacidad@halmex.com.mx">privacidad@halmex.com.mx</a>; or website: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a>).</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has completed a Life Cycle Assessment (LCA) on the impacts of its main products for which Aluminium is considered or used through the LCA Matrix, which defines the methodology for assessing the life cycle of all manufactured products. In 2024, the Entity has prepared the 2024 LCA Report, which was based on a survey of approximately 100% of its products. All Product lines were evaluated.</p> <p>The LCA Report is available at: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> ('Sustainability/Governance' section).</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has defined in the Product Life Cycle Procedure how to disclose data when requested by customers. There have, however, been no formal customer requests to date. The Entity has already made the 2024 LCA Report is available at: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> ('Sustainability/Governance' section).</p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable to the Entity, as all new Product development processes are undertaken at the Entity's Headquarters, located in Hiroshima, Japan.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established a Quality Management System certified by IATF and ISO 9001 standards, with an approach to setting Scrap reduction targets. All products rejected by the Entity are 100 percent (%) recycled (separated by alloy composition) and reused in production. Furthermore, the Entity has demonstrated that products generated in the foundry and machining area are sent to the Remelting area and subsequently returned to the production process as liquid Aluminium.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has implemented a strategy to increase the proportion of recyclable material and has established timelines and targets. The Entity monitors the use of recycled material in its products, which currently shows that approximately 99% of the Aluminium is recycled, with only 1% containing raw materials. In accordance with the principles of the 'Circular Economy', the Entity aims to increase the recycled content share in new product groups, particularly those relevant to the rapidly expanding electric vehicle market.</p> <p>The Entity maintains strong relationships with its suppliers through ongoing communication, supporting and encouraging them to achieve greater transparency on ESG issues. For more information, refer to the Sustainability Report 2024 (page 23) at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has implemented a strategy to increase the proportion of recyclable material and has established timelines and targets. The Entity monitors the use of recycled material in its products, which currently shows that approximately 99% of the Aluminium is recycled, with only 1% containing raw materials. In accordance with the principles of the 'Circular Economy', the Entity aims to increase the recycled content share in new product groups, particularly those relevant to the rapidly expanding electric vehicle market.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity accounts for and publicly discloses its energy use and Greenhouse Gas (GHG) emissions annually, by source. All publicly disclosed energy data and GHG emissions are independently verified and validated before publication, and reported emissions are verified by third parties. Refer to the Entity's Sustainability Report 2024 (pages 13 to 20): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p> <p>The Entity however has not fully assessed and disclosed its related Scope 3 'downstream' emissions.</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>The Entity has developed and published a GHG Emissions Reduction Plan with quantitative targets and trajectories through to 2050. The Entity has adopted a climate strategy based on the goal of limiting global warming to 1.5°C, in accordance with the parameters of the Paris Agreement. The Plan outlines an emissions reduction pathway with specific quantitative targets over different time horizons, covering both operational and supply chain emissions. It includes both short- and long-term emissions reduction targets, covering both operational activities and supply chain impacts.</p> <p>Information on the Entity's strategy towards decarbonisation aligned with 1.5 °C, with the target of reducing net emissions by 2050, is available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Environment' section)</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>The Entity conducts annual reviews of the performance of its decarbonisation measures, and ensuring continuous monitoring of the effectiveness of the actions implemented. The overall decarbonisation program will be comprehensively evaluated in 2030, based on the outcomes of these annual reviews, and the Entity reaffirms its commitment to progressively reduce GHG emissions by 2050.</p> <p>The Entity's Emissions Reduction Plan includes its climate commitment and reduction target by 2050 and has set a target of achieving a 12% reduction by 2030, reaching 1.14 tCO<sub>2</sub>e per tonne, primarily through the expanded use of renewable energy. The Plan has been developed</p>



CRITERION	RATING	COMMENT
		<p>with the ASI Emissions Reduction Pathway Calculation Tool and outlines an emissions reduction pathway with specific quantitative targets over different time horizons, covering both operational and supply chain emissions.</p> <p>Refer to: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Environment' section) and the Entity's Sustainability Report 2024 (pages 13 to 20).</p> <p>The Entity, however, has set an intermediate goal of greater than five years to review and analyse the performance of its decarbonisation program.</p>
5.4 GHG Emissions Management	Conformance	The Entity has developed and implemented a GHG Emissions Management Procedure and facilitates energy and GHG emissions management via its Environmental Management System. The Entity has initiated a transition to clean energy by gradually replacing electricity from conventional sources with electricity derived from renewable sources.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity identifies, assesses, and quantifies its Material Atmospheric Emissions from its activities, implements control plans to minimise exposure and the impacts of atmospheric emissions, periodically monitors the effectiveness of the control plans through the Air Emissions Guidelines, regularly reviews the control plans, and, in the event of significant changes or non-compliances, publicly discloses its information on pollutant discharges and its atmospheric emissions control plan in the Sustainability Report 2024 (pages 16-17): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity identifies, evaluates and quantifies Material Discharges into Water from its activities, implements control plans to minimise exposure and impacts of Discharges into Water, monitors the effectiveness of the control plans periodically, reviews the control plans regularly and, in the event of Major Changes or non-compliance, publicly discloses its information on pollutant discharges and the control plan in the Sustainability Report 2024 (page 22): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has undertaken a risk assessment of areas of operations where spills and leaks may contaminate air, water, or soil. A Management Plan has been developed and implemented, and the Entity reviews the plans periodically or after a Spill/Leakage event or major Business change.</p> <p>Small and isolated leaks of water and chemicals were identified during the Audit, however, there was no record of investigation into the causes of the leaks.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity publicly disclosed the results of the spill risk identification and assessment in the Sustainability Report 2024 (page 22): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p> <p>There have been no Spills or leaks to date.</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity mitigates material impacts through waste recycling. Hazardous waste disposal complies with applicable legal requirements. The Entity publicly discloses the amount of Hazardous and Non-Hazardous waste generated through its activities in its Sustainability Report 2024 (page 25): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p> <p>Inadequate storage of Non-Hazardous Waste was identified during the Audit however.</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	<p>The Entity's slag is stored on-site in accordance with legal regulations and permit requirements and then sent to an external service provider for recycling, with a recovery rate of 85% to 90%.</p> <p>The remaining 10% to 15% is generated as waste, which the Entity sends to a waste disposal facility utilising a Contractor authorised by the Environmental Agency.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity has mapped its water capture and use by source and type, and presents these data in the Sustainability Report 2024 (page 21): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section)</p> <p>A failure in the calibration of water consumption measurement equipment was identified during the Audit.</p>
7.2a-e Water Management	Conformance	<p>The Entity understands that it is located in an area that has historically experienced severe water shortages. In preparation for a potential water shortage in the future, the Entity has processes in place to combat the effects and ensure operations are not disrupted. The Entity has developed a Water Supply Contingency Plan to minimise physical water risks. This Plan is available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Environment' section)</p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has assessed the risk and Materiality of potential impacts on Biodiversity and Ecosystem Services arising from land use and activities within the Area of Influence, using the Biodiversity Risk Guidelines. Refer to: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> ('Sustainability/Environment' section). The assessment concluded that the risks to Biodiversity and Ecosystem Services are classified as low.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as its activities do not pose any significant risk to Biodiversity and Ecosystem Services, as confirmed by the Entity's Biodiversity and Ecosystem Services risk assessment.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Conformance	The Entity has assessed the risk and Materiality of potential impacts on Biodiversity and Ecosystem Services arising from land use and activities within the Area of Influence, using the Biodiversity Risk Guidelines. Refer to: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> ('Sustainability/Environment' section). The Entity has also developed 'Guidelines for Plant Care'.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as its activities are not dependent on any Priority Ecosystem Services, as confirmed by the Entity's Biodiversity and Ecosystem Services risk assessment.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of exotic species that could have significant adverse impacts on Biodiversity in the Area of Influence. No invasive species that could negatively impact Biodiversity and Ecosystem Services have been identified. The Entity has also implemented Guidelines for Exotic Species, to ensure preventive measures against any possible introduction of exotic species from the process of receiving materials.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity prevents and takes all possible measures to ensure the preservation of operations close to World Heritage Sites. According to the World Database of Protected Areas (WDPA), there are no listed assets in the Entity's area of influence.</p> <p>Some distance from the Entity's Area of Influence, in neighbouring cities it is possible to identify the following Ciudad Histórico de Guanajuato y Minas Adyacentes and Villa Protectora de San Miguel de Allende and Santuario de Jesús Nazareno de Atotonilco defined in the Biodiversity Risk Guidelines.</p> <p>At present, the Entity does not have any New Projects or Major Changes in development.</p>
8.6a-d Protected Areas	Conformance	<p>The Entity prevents and takes possible measures to ensure that operations are not close to Protected Areas. No Protected Areas are within the Entity's Area of Influence; according to the World Database on Protected Areas (WDPA), the Entity is not adjacent to terrestrial and inland Protected Areas.</p> <p><a href="https://www.protectedplanet.net/en/thematic-areas/wdpa?tab=WDPA">https://www.protectedplanet.net/en/thematic-areas/wdpa?tab=WDPA</a></p> <p>At present, the Entity does not have any New Projects or Major Changes under development.</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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity respects and supports individual and collective Human Rights and is committed to assessing, preventing and remedying potential adverse impacts consistent with international instruments on Human Rights. It has implemented a Human Rights Due Diligence process, which includes a Risk Assessment and a relevance matrix to map the impact and importance of communities within the Area of

CRITERION	RATING	COMMENT
		<p>Influence. Refer to the following for further information:  <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a></p> <ul style="list-style-type: none"> <li>- Human Rights Policy</li> <li>- Social Policy</li> <li>- Governance Policy</li> <li>- Corporate Code of Ethics and Conduct</li> <li>- Health and Safety Policy</li> <li>- Gender Equality and Women's Empowerment Program 2025</li> <li>- ASI Risk Identification and Assessment Matrix.</li> </ul>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has implemented a Human Rights Policy to assist in eliminating any potential barriers to professional development and to mitigate Discrimination, Violence and Harassment. It has also established a program that promotes Gender Equity and Women's Empowerment to increase the number of women in strategic positions.</p> <p>The Entity's Gender Equality Program is available at:  <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Social Responsibility' section)</p> <p>At the time of the Audit, the Entity was, however, unable to demonstrate the effectiveness of measures taken to promote Gender Equity.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as its operations are located within an established industrial zone and according to the list of World Heritage Sites declared by UNESCO, there are no Sacred sites, values, or Cultural Heritage within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands territories and resources are within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as its operations are located within an established industrial zone and the Entity has not conducted or considered any resettlements/activities resulting in physical dislocations.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and their means of subsistence and use of natural resources. The Entity's Human Rights Due Diligence identified that they do not cause or contribute to adverse impacts on Human Rights in their Area of Influence. However, the Entity has established through a Materiality matrix the level of importance of the communities in the Entity's Area of Influence through development actions. In addition, the Entity has established a procedure for assessing Affected Populations and Organisations.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established a Supplier Sustainability Policy and Guidelines for Conflict-Affected and High-Risk Areas (CAHRAs) that address CAHRAs-related risks and describe the use of tools to identify potential high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if potential high-risk issues are identified.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has established a Risk Committee, and its implementation includes systematic mapping, identification, and mitigation of risks, including CAHRAs-related risks. A transparency hotline is available for Stakeholders (including suppliers and customers) to report violations or suspected violations related to Human Rights.</p> <p>The Entity has evaluated the Entity's Due Diligence practices in relation to CAHRAs in accordance with the OECD Guidelines. Currently, the Entity only has direct and/or indirect acquisition from one supplier located in Canada.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has established a Risk Committee, and its implementation includes systematic mapping, identification, and mitigation of risks, including CAHRAs-related risks. A transparency hotline is available for Stakeholders (including suppliers and customers) to report violations or suspected violations related to Human Rights.</p> <p>The Entity ensures that risk mitigation measures are taken if potential high-risk issues are identified in its supply chain.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited during this ASI Audit, which meets the requirement for this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity provides a summary as to its supply chain risk assessment in its Sustainability Report 2024 (page 23): <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).
9.9 Security practice	Conformance	The Entity does not use armed security forces. A Human Rights risk assessment found no relevant risks related to security practices. The Entity, in its involvement with private security providers, respects Human Rights in accordance with recognised standards and good practices. Both the Entity and its Contractor adhere to respective ethical codes, ensuring professional conduct and respectful engagement with employees and visitors. Interviews confirmed the awareness of procedures and the absence of any reported deficiencies. The security system is contractually controlled and ethically managed.

## 10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the rights of Workers to associate with Unions freely, seek representation, and join Workers Councils as defined in the Human Rights Policy and the Code of Conduct, both of which address Freedom of Association and Collective Bargaining.</p> <p>Refer to the Entity's Human Rights Policy, Social Policy, Governance Policy and Corporate Code of Ethics and Conduct, all available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> (via 'Sustainability/Governance' section)</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 there is no restriction on the right to Freedom of Association and Collective Bargaining in Mexico, where the Entity operates.
10.2a Child Labour	Conformance	The Entity has implemented a Human Rights Policy that references the UN Guiding Principles and is supported by a Risk Identification and Assessment Matrix. The Entity has demonstrated its commitment to respecting Human Rights and not using or supporting Child Labour that could harm the health, safety, or morals of any child under 18.
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented a Human Rights Policy and Forced Labour Guidelines, committing to combating Modern Slavery by not using or supporting any form of Forced Labour, Human Trafficking, Recruitment Fees, or requiring Migrant Workers to make security deposits for accommodation. The Entity has established policies and Codes of Conduct, provides regular training and awareness, undertakes evaluations in accordance with risks to suppliers and commercial partners, including hiring processes, and identifies areas for improvement based on audits, query mechanisms and consultations with interested parties. Corrective actions must be specific, with defined deadlines and assigned responsibilities to guarantee their execution and follow-up.</p> <p>The Entity's Forced Labour Guidelines includes a statement relating to Modern Slavery and is available at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Social Responsibility' section.)</p>
10.4a-c Non-Discrimination	Conformance	The Entity has implemented a Human Rights Policy that references the UN Guiding Principles and a Risk Identification and Assessment Matrix. The Entity has demonstrated its commitment to respecting Human Rights and not engaging in or supporting Discrimination in any situation, as demonstrated in the Human Rights Policy located at: <a href="https://www.halmex.com.mx">https://www.halmex.com.mx</a> ('Sustainability/Social Responsibility' section.)
10.5 Communication and engagement	Conformance	<p>The Entity initiates ongoing communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues via team briefings, information boards and meetings with Worker representatives regarding working conditions, resolution of labour or compensation issues without the threat of reprisal, intimidation, Violence or Harassment.</p> <p>The "Ethical HAL México Listen to You" is available to Workers: "HAL México te Escucha" Helpline Tel: 01 800 890 90 72 - <a href="mailto:privacidad@halmex.com.mx">privacidad@halmex.com.mx</a> and the 'Contact' section of the website (<a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a>).</p>

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity recognises Violence and Harassment in the Human Rights Policy and the Risk Identification and Assessment Matrix. A confidential reporting hotline is available at: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx/</a> ('Contact' section)</p> <p>All Workers are trained in identifying the dangers and risks of Violence and Harassment, as well as in the associated prevention and protection measures. The Entity ensures open communication and direct engagement with workers and their representatives regarding Violence and Harassment in the workplace, as defined in its Human Rights Policy: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx</a> ('Sustainability/Social Responsibility' section.)</p>
10.7a-c Remuneration	Conformance	<p>The Entity demonstrates that it has Policies and procedures with methodologies related to employee compensation, including payments, Overtime, discounts, surveys for salary updates, and Collective Bargaining agreements signed with the Union. The Entity demonstrated that salary payments are made punctually on a weekly basis. All employees receive payslips with payment details.</p>
10.8a-c Working Time	Conformance	<p>The Entity respects Workers' rights to a standard working day, including Overtime, public holidays, paid annual leave, and at least one day off per week, as per local legislation and the Collective Bargaining agreement signed with the Union.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity ensures open communication and direct engagement with Workers and their representatives. Workers are informed of their rights, benefits, and working conditions without threat of reprisal, intimidation or Violence and Harassment, as defined in the Entity's Code of Conduct and Human Rights Policy.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented a documented Occupational Health and Safety (OH&amp;S) Management System consisting of Policies, procedures, and records, through the Occupational Health and Safety Management System Manual.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented a documented OH&amp;S Management System consisting of Policies, procedures, and records through the Occupational Health and Safety Management System Manual.</p> <p>The Entity reviews its Health and Safety Management System at least every five years or when any changes to on-site activities may affect OH&amp;S risks. The Entity publicly discloses the effectiveness of the OH&amp;S Management System in its Sustainability Report 2024 (pages 34-35) available at: <a href="https://www.halmex.com.mx/">https://www.halmex.com.mx</a> ('Sustainability/Governance' section).</p> <p>It was identified during the Audit, however, that there were some specific flaws in the Entity's OH&amp;S Management System, including an unsafe act involving the movement of tools with suspended loads and a failure to critically analyse and take appropriate action regarding the results of Workers' health exams, which revealed hearing loss, making it difficult to understand whether the anomaly occurred during work activities or whether the Worker began the activity with hearing loss.</p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented a system for employee consultation and participation in health and safety matters. Employees are encouraged to report concerns or suggestions on OH&amp;S issues, either personally or through their employee representative. Management responds to employee concerns and suggestions on OH&amp;S issues. The Entity has developed and implemented Policies, systems, procedures, and processes that support employee engagement in OH&amp;S requirements.</p> <p>The Entity also maintains an official communication channel to receive reports of behaviour that violates the principles and guidelines of the Corporate Code of Ethics and Conduct, as well as violations of laws, regulations, Policies, and other internal standards.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 December 2025	Initial Certification Audit – Full Certification