

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HMT Höfer Metall Technik GmbH & Co. KG

CERTIFICATE NUMBER

369

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

DATE OF ISSUE

10 MAY 2024

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

9 MAY 2027

ASI ACCREDITED
AUDITING FIRM

CERTAINABLE GMBH

CERTIFIED SINCE

10 MAY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Höfer', with a long horizontal line extending to the right.

CERTIFICATION SCOPE

Production of semi-finished
Aluminium products at HMT Höfer
Metall Technik GmbH & Co. KG
located in Hettstedt, Germany.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	HMT Höfer Metall Technik GmbH & Co. KG
ENTITY NAME	HMT Höfer Metall Technik GmbH & Co. KG
CERTIFICATION SCOPE	Production of semi-finished Aluminium products at HMT Höfer Metall Technik GmbH & Co. KG located in Hettstedt, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (13 – 16 November 2023)Surveillance Audit and Scope Change (10 – 12 March 2025)
AUDIT FIRM	Certainable GmbH
AUDIT DATE	<ul style="list-style-type: none">13 – 16 November 2023 (Initial Certification Audit)10 – 12 March 2025 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 March 2024 (Initial Certification Audit)29 April 2025 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 16 November 2023)</u></p> <p>The Audit Scope covers HMT Höfer Metall Technik GmbH & Co. KG for the production of semi-finished Aluminium products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-FabricationMaterial Conversion <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit and Scope Change (10 – 12 March 2025)</u></p> <p>The Audit Scope covers HMT Höfer Metall Technik GmbH & Co. KG for the production of semi-finished Aluminium products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.</p>

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

10 May 2024 - 9 May 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

9 May 2027

CERTIFICATE NUMBER

369



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

Höfer Metall Technik HMT (the 'Entity') is an extrusion plant that specialises in producing Aluminium profiles. It is part of the Höfer group and provides precision profiles to customer specifications, as well as problem-specific and customer-oriented product developments. The Entity's foundry produces up to thirty tonnes of Aluminium billets daily, whilst employees work on two fully automatic extrusion lines. The Entity supplies a growing international clientele in the automobile, construction industry and other sectors. The Entity has established an efficient Management System to meet customer expectations. The processing options range from sawing to stamping, drilling, milling, and joining, and the Entity covers an area of approximately ten hectares with approximately 350 employees on site. The Entity is located within the industrial zone of Hettstedt, Germany.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes to maintain awareness of and to ensure Compliance with Applicable Law. The Entity has implemented and maintains an Integrated Management System, which is certified against IATF 16949, ISO 14001 and ISO 50001 by an accredited certification body.</p> <p>However, the process for identifying, assessing, and implementing changes in legal requirements into binding obligations requires further development to ensure systematic Compliance.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. The Entity has publicly disclosed its position against Corruption in its Code of Conduct and Supplier Code of Conduct, accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf and https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_f%C3%BCr_Gesch%C3%A4ftspartner_-_2023_10_18.pdf</p> <p>The Entity has established multiple anti-Corruption measures including Policies, training, Due Diligence assessments and a 'whistleblowing' mechanism. All anti-Corruption measures are endorsed by senior management. Relevant employees receive anti-Corruption training.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued and publicly discloses its Code of Conduct at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Code includes principles relevant to environmental, social and governance performance. The Entity provides regular training programs on the Code of Conduct for employees.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. These Policies are integrated into the Entity's Code of Conduct, available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Policies have been endorsed by senior management. The Entity has provided training to its employees to ensure awareness of the Policies.</p>
2.2a-c Leadership	Conformance	<p>The Entity has nominated a person at the senior management level with overall responsibility and authority for ensuring Conformance with the ASI Performance Standard and ensuring sufficient resources needed to establish, implement, maintain and improve the</p>

CRITERION	RATING	COMMENT
		Management Systems required throughout the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has established a certified Integrated Management System certified to IATF 16949, ISO 14001:2015 and ISO 50001 Standards, which address Environmental Management System requirements. The external certificates are up-to-date, and the external audit reports confirm the effectiveness of the Environmental Management System.</p> <p>The external certifications are available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/ISO_14001_-_2023-0103059-00_ENG_HMT_Höfer_Metall_Technik_GmbH_-_Co._KG.pdf</p>
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented and maintains an effective Social Management System addressing Human Rights, Labour rights and Occupational Health and Safety (OH&S). This was confirmed by a document review and interviews with Workers and management.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a system and practices for responsible sourcing. The Entity's Supplier Code of Conduct serves as a Responsible Sourcing Policy and addresses environmental, social and governance issues.</p> <p>The Supplier Code of Conduct is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/HMT_Code_of_Conduct_for_Business_Partners_-_Rev_1_-_2023_10_18_EN_final.pdf</p> <p>The Code is regularly reviewed and has been provided to and acknowledged by the Entity's suppliers.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The Entity has however developed a documented Procedure relating to Environmental and Social Impact Assessments.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The Entity has however developed a documented Procedure relating to Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has implemented a site-specific Emergency Response Plan (ERP). The ERP is made available to authorities and auditors, and will be available to external Stakeholders upon request, subject to management's approval.</p> <p>It was however identified the ERP is partially incomplete and needs to be updated.</p>
2.8a-d Suspended Operations	Conformance	The Entity has systematically identified and evaluated risks associated with its operations. Specific contingency measures associated with suspended operations have been defined for identified risks, as confirmed during the site visit.
2.9a-b Mergers and Acquisitions	Conformance	The Entity in Hettstedt belongs to the Group known as Josef Hoefler GmbH. Mergers and Acquisitions are managed by the Group

CRITERION	RATING	COMMENT
		Headquarters located in Urmitz am Rhein. There are no Merger or Acquisition plans currently nor in the near future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented a Procedure for the management of closure, decommissioning and divestment events. Any closure, decommissioning and divestment activities will be managed centrally by the Group Headquarters. At the time of the Audit, there were no closures, decommissioning or divestments planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in its 2024 Sustainability Report which is aligned to Global Reporting Initiative (GRI) Guidelines and is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity discloses information on non-Compliances and liabilities in the 2024 Sustainability Report, page 21: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf No non-Compliances and liabilities were reported in 2024.
3.3a-c Payments to Governments	Conformance	The Entity only makes payments to Government on a legal basis. No payments were made to political parties in the reporting period. Information on related payments is provided in the 2024 Sustainability Report, page 21: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Grievance and Whistleblower Mechanism (HinSchG-Meldekanal). All grievances can be reported via the mechanism which is accessible at: https://app.whistle-report.com/report/8428f8fa-94f7-406d-8614-71470f6bf39e
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Product lines and published these data in Environmental Product Declarations (EPDs).
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The EPDs contain life cycle impact information and includes details of the system boundaries, underlying assumptions and data sources. The EPD for the cast billet Product is accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Aluminium-Strangpressbolzen.pdf The EPD for the extruded profile Product is accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Aluminiumprofil_pressblank.pdf

CRITERION	RATING	COMMENT
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as it manufactures products according to the customer's design specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity works continually and systematically to minimise its generation of Scrap. Internal Scrap is collected and remelted. Sawdust and other alloys are separated into different containers and sent to recycling partners. The Entity has implemented a target of 100% Scrap for collection, recycling or reuse.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	<p>The Entity only supplies to other businesses ('B2B') and does not sell to consumers. Therefore, the promotion of recycling occurs through the Entity's support of the local industry association, Aluminium Deutschland e.V. which is working on improving the recycling strategy for Aluminium Products at a national level. Information regarding Aluminium Deutschland e.V. and its recycling strategy is available at: https://www.aluminiumdeutschland.de/themen/nachhaltigkeit-und-recycling/</p> <p>The Entity has described its approach to recycling within its own operations in the 2024 Sustainability Report, page 16: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity's supports and is an active member of the local industry association, Aluminium Deutschland e.V. which is working on improving the recycling strategy for Aluminium Products at a national level. Information regarding Aluminium Deutschland e.V. and its recycling strategy is available at: https://www.aluminiumdeutschland.de/themen/nachhaltigkeit-und-recycling/</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has publicly disclosed its Material Greenhouse Gas (GHG) emissions and energy use data in the 2024 Sustainability Report, pages 11-14, accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_-_2024_-_Status_Auswertung_Juli_2025.pdf</p> <p>The GHG emissions data disclosed covers Scope 1 and Scope 2 emissions. Scope 3 emissions were assessed in the Environmental Product Declarations which consider Life Cycle Impacts and were determined to not be Material given the majority of Aluminium used in the Entity's Products is Secondary Aluminium.</p> <p>The Entity's energy and GHG emissions data have been independently 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 –	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
In production up to and including 2020		
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has issued its GHG Emissions Reduction Plan ('Klimastrategie'), consistent with a 1.5°C warming scenario. The GHG Emissions Reduction Plan was developed using the ASI GHG Pathways Method and Calculation Tool using 2020 as the baseline year. The GHG emissions and energy use are reviewed annually by the Entity's management. The GHG Emissions Reduction Plan is accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/HMT_-_Klimastrategie_2025.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has issued its GHG Emissions Reduction Plan ('Klimastrategie'), consistent with a 1.5°C warming scenario. The GHG Emissions Reduction Plan with Intermediate Targets was developed using the ASI GHG Pathways Method and Calculation Tool using 2020 as the baseline year. The GHG emissions and energy use are reviewed annually by the Entity's management. The GHG Emissions Reduction Plan is accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/HMT_-_Klimastrategie_2025.pdf</p> <p>Progress against the 2020 baseline will be reviewed annually and publicly reported in future disclosures. GHG emissions and energy use data are disclosed in the annual Sustainability Report.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity works systematically to achieve performance aligned with its GHG Emissions Reduction Plan and targets. It has implemented and maintains an Energy Management System, developed in accordance with ISO 50001.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has determined that its Emissions to Air, other than CO₂, are not Material and therefore it has not published emissions monitoring data.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has disclosed its Discharges to Water in the 2024 Sustainability Report, page 14: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf</p> <p>The Entity does not directly discharge into water and process water is channelled via closed loop cooling circuits.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes related to the detection, assessment and management of Spills and Leakages. Controls were reviewed to prevent contamination of air, soil and water due to major Spills and Leakages.</p> <p>The Entity is subject to national law regarding systems for the management of potentially water polluting substances and holds an ISO 14001 certificate from an accredited certification body. An assessment and environmental analysis were conducted. The Spill</p>

CRITERION	RATING	COMMENT
		Management Plan is disclosed at the entry gate on site and provided to the local fire department and authorities.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	No major Spills or incidents were reported since the Entity joined ASI. The Entity reports on whether Spills or Leakages have occurred in the 2024 Sustainability Report, page 15: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>Within its Environmental Management System, the Entity has developed and implemented a Waste management plan and identified key Waste streams generated during production. The Entity has disclosed the type and quantity of the disposed Waste in the 2024 Sustainability Report, page 15: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf</p> <p>However, the operational waste management practices could be further improved as some waste separation activities were not implemented correctly, and issues were identified in the Entity's annual waste reporting.</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 works to minimise the Aluminium content of the Dross produced. The Entity stores and manages Dross in covered and closed systems to prevent environmental release. All Dross is transferred to an ASI Certified external recycling Facility for appropriate management and disposal. A 'melt recovery project' is underway to further reduce the Aluminium content in Dross and improve resource efficiency.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has publicly disclosed its water withdrawal, return and consumption data in the 2024 Sustainability Report, page 14: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf</p> <p>An assessment of water-related risks in the Watersheds within the Entity's Area of Influence did not identify any Material risks. The Entity's water consumption is very low relative to the total volume of water extracted quantity of the region.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's water risk assessment did not identify any Material water-related risks.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity risk assessment that considered the site's operations and Area of Influence. The Entity identified their risks and impacts on the Biodiversity and Ecosystem Services as low. The Entity has reported on their assessment of Biodiversity risks in the 2024 Sustainability Report, page 16: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has identified their risks and impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has identified their risks and impacts on Biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the 2022 Biodiversity assessment did not identify Material impacts on Priority Ecosystem Services within the Entity's Area of Influence.
8.4 Alien Species	Conformance	The Entity works to prevent the accidental introduction of Alien Species. Based on the supply chain operations of the Entity, the main potential Alien Species risk relates to the usage of wooden pallets. The Entity procures all pallets from local sources with no or minimal Alien Species introduction risk. All incoming pallets are International Plant Protection Convention (IPPC) labelled and treated, and a risk assessment demonstrated they are in a low-risk category.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not operating in or near a Protected Area or world Heritage site according to the UNESCO World Heritage list. (https://whc.unesco.org/en/statesparties).
8.6a-d Protected Areas	Conformance	The Entity is not located in a Protected Area. The nearest Protected Areas are approximately five kilometres from the Entity based on the map of Protected Areas of Sachsen-Anhalt, accessible at: https://lwva.themenbrowser.de/UMN_LVWA/php/geoclient.php?name=naturschutz Due to the size and nature of the business, there is no need to implement management plans to ensure the Entity's activities and Facilities do not adversely impact these Protected Areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights. The Code of Conduct is available at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf

CRITERION	RATING	COMMENT
		The Entity has conducted a documented Human Rights Due Diligence assessment (' <i>Bewertung Umwelt, Energie und Sozialaspekte</i> ') with internal Stakeholders. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews during the Audit.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has demonstrated that it works to promote gender equity and women's empowerment in the workplace. A relevant program has been established and is disclosed in the 2024 Sustainability Report, page 18: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites near the Entity. The Entity it is located in an industrial area of the town of Hettstedt.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites near the Entity. The Entity it is located in an industrial area of the town of Hettstedt.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have not been any New Projects or Major Changes that required any human displacement.
9.7a-h Affected Populations and Organisations	Conformance	Due to the size and nature of the Entity's Business, there were no significant issues identified related to the rights and interests of Affected Populations and Organisations within the vicinity of the production site. As no significant risks have been identified, there is no necessity for an action plan related to Affected Populations and Communities.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented and executed a risk based-Due Diligence process over its Aluminium supply chain which is in accordance with OECD Guidance. During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human

CRITERION	RATING	COMMENT
		Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has issued a Supplier Code of Conduct to business partners.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Minor Non-Conformance	The Entity has established a process to assess and evaluate its suppliers and the associated risk levels. The Entity does not source from CAHRAs. 100% of its Aluminium suppliers are certified to the ASI Performance Standard. However, the Entity's Management System needs to be improved to effectively detect risks within the supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has identified that it does not source CAHRAs. 100% of its Aluminium suppliers are certified to the ASI Performance Standard. The Entity has established a process to assess, evaluate and monitor their suppliers and the associated risk levels.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices have been audited as part of the ASI Performance Standard Audit. In addition, the Entity is establishing a process to regularly audit the supply chain Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Entity has not yet implemented annual reporting on its supply chain Due Diligence.
9.9 Security practice	Conformance	Document review and worker interviews confirmed that the private security provider the Entity has hired respects Human Rights in accordance with recognised standards and good practices. Furthermore, the private security provider is subject to the requirements of the Entity's Code of Conduct.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Interviews with Workers and their representatives confirmed that the Entity respects the rights of Workers to unite freely, seek representation and join the Works Councils without interference. The site has freely elected worker representation and adheres to Collective Bargaining Agreements made with the relevant Trade Unions.
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. Applicable Law in Germany does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker (an apprentice) was 16 years old at the time of the Audit, as confirmed by interviews and the employee roster.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and management and document review. In their Code of Conduct, the Entity stated that they do not tolerate any form of Human Trafficking or Child Labour and are fundamentally opposed to any type of Forced or Compulsory Labour.

CRITERION	RATING	COMMENT
		However, it was identified an annual public Modern Slavery Statement detailing actions to address Modern Slavery has not been developed nor issued.
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Code of Conduct has been made available to Workers and they receive training in the values stated in the Code. As confirmed by interviews and document review, the Entity does not engage in or support Discrimination. The Entity is working towards eliminating the historical disadvantage faced by women.</p>
10.5 Communication and engagement	Conformance	Workers, their representatives and management confirmed that the Entity communicates appropriately and co-operates in good faith on work-related issues. Works Council members and management meet regularly. According to the employees interviewed, the management values its employees.
10.6a-g Violence and Harassment	Conformance	<p>The Entity is committed to a respectful working environment and has prohibited any form of Harassment or pressure in the workplace, nor do they tolerate Discrimination or corporal punishment. The Entity's position on Violence and Harassment is established in its Code of Conduct accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Code of Conduct is reviewed regularly and is communicated to Workers who also receive related training. As confirmed by interviews and document review, the Entity does not engage in, nor tolerate the use of inadequate and unacceptable treatment of Workers.</p>
10.7a-c Remuneration	Conformance	The Entity fulfils the requirements of this Criterion in full, as confirmed by interviews and document review. Wages meet the industry standard and are well above the legal minimum. Supporting evidence, such as work contracts, pay slips and Collective Bargaining agreements were made available during the Audit.
10.8a-c Working Time	Conformance	Interviews and document review confirmed that the Entity complies with Applicable Law and Collective Agreements on Working Time, public holidays and annual leave. The provisions in place ensure that Workers have time-off and workday lengths compliant with Applicable Law, industry standards and the requirements of this criterion.
10.9a-b Informing Workers of Rights	Conformance	Interviews with Workers and management confirmed that Workers are informed about their rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has issued and communicated its Policy related to Occupational Health & Safety (OH&S), integrated into its Code of Conduct accessible at: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf

CRITERION	RATING	COMMENT
		<p>hmt.de/fileadmin/data/pdf/unternehmen/News/HMT_Verhaltenskodex_-_Rev_3_-_2023_11_30.pdf</p> <p>The Entity has implemented an active OH&S Management System, as confirmed by site tours, interviews and document review.</p> <p>However, it was identified that the awareness of compliance with operating instructions could be increased among Workers. In addition, the process for coordinating with external companies or providers regarding OH&S practices is not clearly defined or monitored.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented a process to review its OH&S Management System. The Entity conducts internal audits and management reviews are held quarterly. A benchmark with the industry sector is ensured. The Entity has reported on its lagging OH&S Key Performance Indicators within the 2024 Sustainability Report, page 21: https://www.hoefer-hmt.de/fileadmin/data/pdf/unternehmen/qualitaet/Nachhaltigkeitsreport_2024.pdf</p> <p>However, performance against leading OH&S indicators and the comparative analysis with peer businesses are not part of the annual public disclosure.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>Employees are well integrated into OH&S management throughout the Entity. This is facilitated through participation in risk assessments and participation in occupational safety committee meetings.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 May 2024	Initial Certification Audit – Full Certification
1	16 December 2025	<p>Surveillance Audit and Scope Change</p> <p>Scope Change to apply Supply Chain Activities ‘Aluminium Re-melting/Refining’ and ‘Casthouses’ to more accurately represent the Entity’s activities.</p> <p>Change in Audit Firm to Certainable GmbH</p>