

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hammerer Aluminium Industries Extrusion SRL

CERTIFICATE NUMBER
227

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

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
17 DECEMBER 2025

DATE OF EXPIRY
16 DECEMBER 2028

CERTIFIED SINCE
14 NOVEMBER 2022

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'H' followed by a horizontal line.

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*

CERTIFICATION SCOPE

Extrusion of Aluminium profiles at
Hammerer Aluminium Industries
Extrusion SRL (Romania).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion SRL
CERTIFICATION SCOPE	Extrusion of Aluminium profiles at Hammerer Aluminium Industries Extrusion SRL (Romania).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (25 July – 19 September 2022)Re-Certification Audit and Scope Change (21 – 24 October 2025)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">25 July – 19 September 2022 (Initial Certification Audit)21 – 24 October 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">8 September 2022 (Initial Certification Audit)7 November 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (10 – 18 October 2022)</u></p> <p>The Audit Scope covers the extrusion of Aluminium profiles at Hammerer Aluminium Industries Extrusion SRL, Romania.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (21 – 24 October 2025)</u></p> <p>The Audit Scope covers the extrusion of Aluminium profiles at Hammerer Aluminium Industries Extrusion SRL, Romania.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <p><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.</p>

-
- ☑ 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	17 December 2025 – 16 December 2028
----------------------	-------------------------------------

NEXT AUDIT TYPE	Surveillance Audit
-----------------	--------------------

NEXT AUDIT DATE	17 June 2027
-----------------	--------------

CERTIFICATE NUMBER	227
--------------------	-----



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

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

ENTITY OVERVIEW

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

Since the HAI Group was founded, it has expanded to eight locations in four countries and established a joint venture company in South Korea. The annual tonnage processed has increased to 250,000 tonnes, and turnover has multiplied from 110 million euros to 823 million euros in 2024. The team has expanded from 350 to around 1,800 employees.

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

Hammerer Aluminium Industries Extrusion SRL (the 'Entity') is a subsidiary of the HAI Group and is located in Chisineu-Cris, Romania. The Entity produces extruded Aluminium profiles, machined components made of Aluminium and thermally insulated Aluminium composite profiles. The Entity's annual production capacity is approximately 40,000 tonnes, and primarily supplies Aluminium components for the construction and industry markets in Europe. The Entity currently employs approximately 350 Workers.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the legal compliance requirements. The Entity has implemented systems (e.g., a legal database) to maintain awareness of and ensure compliance with Applicable Law. The Entity holds ISO 9001, ISO 14001 and ISO 45001 certifications from an accredited certification body (TÜV Rheinland). The HAI Group supports the Entity with legal counsel.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has issued and communicated a Code of Conduct for Employees, Code of Conduct for Suppliers and Anti-Corruption Guideline, which are publicly available via: https://www.hai-aluminium.com/downloads</p> <p>The Entity has adopted the 'Four Eyes Principle' approach, and a table of authority is implemented. Training has been provided to employees on business ethics. The HAI Group operates a 'whistleblowing' hotline where potential breaches or suspected Corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has published and communicated a Code of Conduct for Employees in German and the local language, available via: https://www.hai-aluminium.com/downloads</p> <p>The Code clearly states that the Entity in no way tolerates Corruption, antitrust violations, Bribery, money laundering, unfair advantages, or prohibited agreements. The Code is regularly reviewed with the latest version, dated February 2025.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintained Policies consistent with the environmental, social and governance (ESG) practices included in the ASI Performance Standard. The Policies are the subject of periodic employee training. The Entity holds current ISO 9001, ISO 14001 and ISO 45001 certifications from an accredited certification body (TÜV Rheinland).</p> <p>In accordance with the Entity's Environmental, Health and Safety Management System, senior management endorsement has been given and support provided through the provision of resources and annual review of the Policies.</p> <p>The Entity has communicated the Policies internally and externally as appropriate. The Code of Conduct for Suppliers is actively communicated to relevant suppliers. Refer to: https://www.hai-aluminium.com/downloads</p>
2.2a-c Leadership	Conformance	<p>The Entity's Chief Operating Officer has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the Standard. The role is supported by the local team and the HAI Group. Responsibilities are reflected in organisational charts and position descriptions.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015. The system is certified by an accredited certification body the certificate is accessible at: https://www.hai-aluminium.com/downloads</p> <p>During the recent external audit of the Management system, full Compliance was confirmed and no non-conformities were raised.</p>
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	<p>The Entity has documented and implemented an accredited Occupational Health and Safety (OH&S) Management System, of which aspects of Human and Labour Rights are also managed. Although specific system elements are present, the Social Management System is not yet fully formalised and documented.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has issued a sourcing policy in the Code of Conduct for Suppliers, available at: https://www.hai-aluminium.com/downloads</p> <p>The Entity's sourcing process is documented, and is in accordance with the requirements of the ASI Performance Standard. Regular Due Diligence and supplier evaluation is implemented, which is undertaken by the HAI Central Metal Management Department, which conducts all metal purchasing for the Entity.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has implemented a documented a procedure for Impact Assessments. The Entity's most recent expansion was an additional production line and warehouse, which was accompanied by an Environmental Impact Assessment (EIA). The assessment determined that there would not be any notable social impacts.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has implemented a documented a procedure for Impact Assessments. The Entity's most recent expansion was an additional production line and warehouse, which was accompanied by an Environmental Impact Assessment (EIA). The assessment determined that there would not be any notable Human Rights impacts.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed and implemented a site-specific Emergency Response Plan, that includes plausible emergency scenarios. Emergency training (e.g. spill of chemicals) and evacuation drills are routinely undertaken.</p> <p>A copy of the Emergency Response Plan is available upon request.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a business continuity plan which contains also business resilience aspects. The Entity has addressed environmental impacts arising from both normal and abnormal situations.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has not undergone nor planned a merger or acquisition since becoming an ASI Member. A process has been defined by the Entity to manage merger or acquisition activities, should these occur in future.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>A procedure for closure, decommissioning and divestment has been established in accordance with the requirement of ASI Performance Standard. There has been no such case has occurred since the Entity joined ASI.</p>

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and material environmental, social, and economic impacts via the HAI Group Sustainability Report, which has been developed based on the Global Reporting Initiative (GRI) Guidelines. The report is available at: https://www.hai-aluminium.com/en/download-center
3.2 Non-compliance and Liabilities	Conformance	Information on significant fines, judgments, penalties and non-monetary sanctions is included in the Sustainability Report 2024, page 75: https://www.hai-aluminium.com/en/download-center/
3.3a-c Payments to Governments	Conformance	As confirmed by HAI's management and the Entity's annual report of the financial audits, no payments were made to the Government or authorities other than those required by law, and no payments were made to politicians, political parties or related organisations. Refer to the Sustainability Report 2024, page 75: https://www.hai-aluminium.com/en/download-center/
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established accessible Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established: ethics@hai-aluminium.com</p> <p>A second communication channel is accessible for all Stakeholders at: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852</p> <p>Employees can also direct concerns to Worker representatives. Due to the size and nature of the business, Stakeholders can also easily reach senior management directly.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has developed a Life Cycle Assessment (LCA), prepared by a specialised external service provider, which is based upon both ISO 14040 and ISO 14044 Standards.</p> <p>The Environmental Product Declarations (EPD) for the Entity's "SustainAl 4.0" and "SustainAl 2.0" Aluminium profiles are available at: https://ibu-epd.com/veroeffentlichte-epds/</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has developed an LCA, prepared by a specialised external service provider, which is based upon both ISO 14040 and ISO 14044 standards. The LCA is available to clients on request.</p> <p>The EPDs for the Entity's 'SustainAl 4.0' and 'SustainAl 2.0' Aluminium profiles are available at: https://ibu-epd.com/veroeffentlichte-epds/</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, they do not have design responsibilities, as all design requirements are provided by customers (both for extrusion and processing departments).
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented systems and a program to recycle 100% of its Aluminium Process Scrap at HAI Santana. Internally Generated Scrap volumes are monitored monthly. The Entity is not required to

CRITERION	RATING	COMMENT
		separate Scrap of different Aluminium grades, as all material has a similar chemical composition (6xxx series according to EN 573-3).
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	The HAI Group's business concept is based on recycling of 'end-of life' Aluminium. The Entity has implemented a strategy, including specific timelines, activities and targets. Key elements are HAI's remelting/casting plants in Santana, Romania and Ranshofen, Austria which are collecting Aluminium Scrap (including 'end of life' products) for their melting and Casting production. The Group has achieved a share of secondary Aluminium greater than 75%.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity only supplies Aluminium products to other businesses and not consumers. However, the Group closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products, and works with national and international Scrap dealers to secure material for their remelting/casting plants.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity as part of HAI Group has disclosed the Entity Greenhouse Gases (GHG) emissions and energy use by source in its Sustainability Report 2024, on pages 28, 31 and 35: https://www.hai-aluminium.com/downloads</p> <p>Independent verification of energy and GHG data covering the period 2024 was, however, not available at the time of the Audit.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	Using ASI's Entity GHG Pathways Calculation Tool, HAI Group has established both an Entity-specific GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway. Both are publicly available in the Sustainability Report 2024, page 28: https://www.hai-aluminium.com/downloads
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has part of the HAI Group has published its GHG emissions reduction targets and plan, and has implemented an effective strategy to achieve these targets, including Intermediate Targets. Refer to the Sustainability Report 2024, page 28: https://www.hai-aluminium.com/downloads
5.4 GHG Emissions Management	Conformance	The Entity has implemented a system and processes to implement its GHG reduction targets. The GHG management system is integrated into the Entity's Environmental Management System.

CRITERION	RATING	COMMENT
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Emissions data are published in the Sustainability Report 2024, page 28: https://www.hai-aluminium.com/downloads Emissions to Air included CO ₂ , CO, NO _x , SO ₂ and dust. Measurements in 2024 confirmed that the values are far below the legally prescribed limits. Due to the low emission levels, as of 2025, the Entity is only required to measure dust.
6.2a-g Discharges to Water	Conformance	The Entity reports quantitative data on Discharges to Water are published in the Sustainability Report 2024, pages 36-37: https://www.hai-aluminium.com/downloads Compliance with the Entity's water permit and water consumption is regularly monitored. The Entity has also established a water minimisation plan.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity periodically assesses the major risk areas related to Apills and Leakage. Its emergency team receives annual Spill training. As confirmed by interviews, there occurred no Material Spills in the reporting period. The Entity reports on Spills and Leakages are published in the Sustainability Report 2024, page 43: https://www.hai-aluminium.com/downloads
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity reports on Spills and Leakages are published in the Sustainability Report 2024, page 43: https://www.hai-aluminium.com/downloads
6.5a-c Waste Management and Reporting	Conformance	The Entity has documented and implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. A key element of the Entity's recycling efforts is HAI's nearby remelting/casting plant in Santana, Romania, which collects Aluminium Scrap for its own melting and Casting production. The Entity publicly discloses the quantity of generated waste in the Sustainability Report 2024, pages 38-40: https://www.hai-aluminium.com/downloads
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. The documented water mapping identifies the source, use and destination of the water streams. The risk assessment of impacts arising from water use as it relates to the source Watershed did not identify major risks. This evaluation has been confirmed by the Entity's water supplier. The Entity reports on material water use in the Sustainability Report 2024, page 41: https://www.hai-aluminium.com/downloads

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as it has identified water-related risks as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has undertaken a Biodiversity assessment, conducted by a specialised consultant, and has implemented a Biodiversity Action Plan. The implementation of the plan is monitored periodically.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.2a-g Biodiversity Management	Conformance	Whilst risks have been assessed as low, the Entity has established and implemented a Biodiversity Action Plan that contains time-bound goals. This plan reflects the Biodiversity Mitigation Hierarchy, as applicable. Biodiversity is discussed with the local authority, as legally required, during the permitting phase. The Biodiversity assessment determined that further consultation with other external Stakeholders was not required.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified in its Area of Influence.
8.4 Alien Species	Conformance	<p>The Biodiversity assessment, which included the topic of Alien Species, did not identify any need for specific actions. All suppliers of wood packaging, however, provide material that is conformant with the International Standard for Phytosanitary Measures (ISPM-15).</p> <p>The Entity neither receives nor ships goods from outside of Europe.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not operate, plan to explore or develop New Projects in or close to World Heritage properties. There are no World Heritage Properties on or near the actual site.
8.6a-d Protected Areas	Conformance	Based on the Entity's Biodiversity assessment, it was concluded that the Entity has no Material impact on the Protected Areas in its Area of Influence. Protected Areas include 'ROSPA0015' and 'ROSCI0231'. Refer to the European Environment Agency for further information on these areas: http://EUNIS.eea.europa.eu/sites/
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has issued a Code of Conduct for Employees and a Code of Conduct for Suppliers, which both express a commitment to respect Human Rights. The Codes have been communicated to employees (via postings, training and the intranet) and other Stakeholders (via letters, and the internet) and are accessible at:</p> <p>https://www.hai-aluminium.com/downloads</p>

CRITERION	RATING	COMMENT
		The Entity has undertaken a documented Human Rights Due Diligence assessment, which has confirmed that there are no salient adverse Human Rights impacts present. Indigenous Peoples are not present in the region or in the Entity's Area of Influence.
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the requirements on women's rights. No indication of deliberate Discrimination of women was observed during the Audit. In accordance with National Law, the Entity grants up to two years paid maternity leave. Interviews with female Workers did not indicate any Discrimination, Harassment or unrespectful behaviour at the plant.</p> <p>Whilst objectives related to the share of women in the workforce exist, a formal plan for promoting gender equity and women's empowerment is not yet available.</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. However, the Entity has established processes to identify minorities based on linguistics, and social characteristics and conduct public consultations on the impact of every new development or investment.
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 there are no Indigenous Peoples 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 within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since joining ASI and it has undertaken its activities in accordance with its construction permit.
9.7a-h Affected Populations and Organisations	Conformance	The outcome of the Human Rights Due Diligence conducted by the Entity, has confirmed that there are no issues with Local Communities and therefore no need for action is required. The Entity, however, actively supports the Local Community with various campaigns (e.g., blood donations, health education, maintaining a community park, participation in the "Let's do it, Romania" environmental cleaning campaign).

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity follows the definition of CAHRAs from the 'Armed Conflict Location Event Data Project' and Peace Direct, via: www.acleddata.com and www.peacedirect.org According to the list of suppliers, no supplies are sourced from a Conflict-Affected and High-Risk Areas (CAHRAs). The Entity's metal supply is managed from HAI Headquarters in Ranshofen, Austria.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity via the HAI Group has standards for its supply chain in place, which clearly define the rules and expectations for suppliers, contractors, and others with whom they do business. The Entity has implemented a supplier evaluation and selection process based on a documented risk rating.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity as part of the HAI Group has implemented a basic strategy to respond to and identify risks in their supply chain. As a final stage in the process, the Entity may terminate business activities with the supplier.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited during this ASI Audit and meet the requirement for this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity via HAI Group has implemented a supply chain Due Diligence process and has publicly reported a summary in the Sustainability Report 2024, page 46: https://www.hai-aluminium.com/downloads
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that the security staff had behaved appropriately in carrying out their duties.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to unite freely in the Labour Unions, seek representation and join the Workers' Council without interference. A freely elected Worker representation process has been established. A Union is not currently represented at the Entity. The Entity respects the right to Collective Bargaining. worker representatives and management at the Entity have negotiated a Collective Bargaining Agreement (CBA).
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in Romania, where the Entity operates.
10.2a Child Labour	Conformance	The Entity has implemented a Code of Conduct that commits to the prohibition of Child Labour: https://www.hai-aluminium.com/downloads The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker at the Entity was 19 years old. The Entity has established practices to ensure that children are not employed.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.</p> <p>The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.</p> <p>Migrant Workers make up approximately one percent of the Entity's workforce. No Workers are required to lodge deposits or security payments at any time.</p> <p>The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace and does not employ armed security staff. The Entity does not retain original copies of Workers' identity documents and only copies of training certificates are retained in the personnel files.</p> <p>The Entity's Modern Slavery Statement is available at: https://www.hai-aluminium.com/wp-content/uploads/2024/09/202409-Modern-Slavery-Statement-V01_EN.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>Interviews and document review confirmed that the Entity does not deliberately discriminate. A clear commitment has been made in the Code of Conduct, available at: https://www.hai-aluminium.com/downloads</p> <p>The current gender ratio is considered balanced (>40% female employees) and women are present in a variety of management positions.</p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment. Management meets regularly with Workers and their representatives. Various information channels have also been established including unrestricted access to the intranet, and information screens in the canteen.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers.</p> <p>The Entity as part of the HAI Group has issued and publicly communicated its Policy on Violence and Harassment, available at: https://www.hai-aluminium.com/downloads</p> <p>Workers interviewed during the Audit did not report any instances of Violence or Harassment.</p>
10.7a-c Remuneration	Conformance	<p>The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week exceed the legal minimum standard and meet the definition of a 'living wage'. In addition to salary, additional benefits apply including health insurance, medical services, free meals and free vouchers for food shopping.</p>

CRITERION	RATING	COMMENT
		Payments to Workers are made by the Entity in full, monthly via bank transfer. Workers receive payslips that list all necessary information on hours worked, surcharges and deductions.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Overtime is not excessive. Minimum annual leave is 23 days, more days are granted depending on the length of service.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and Human Resources Management Representatives during the Audit, Workers are informed on Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the Code of Conduct and corporate Policies.

11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has documented and implemented an OH&S Management System that is independently certified to ISO 45001:2018. Refer to: https://www.hai-aluminium.com/downloads
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has defined and is monitoring OH&S-related leading and lagging performance indicators. Performance indicators are presented in the Sustainability Report, pages 69 and 85: https://www.hai-aluminium.com/downloads</p> <p>These data however do not include a comparison with leading practice and/or peer organisations.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established a joint Health and Safety Committee, which meets four times per year. Additional mechanisms have been implemented, including toolbox meetings, where Workers can raise, discuss and participate in the resolution of Occupational Health and Safety (OH&S) issues with management. Worker representatives meet regularly and on demand with management.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	14 November 2022	Initial Certification Audit – Full Certification
1	17 December 2025	Re-Certification Audit – Full Certification. Scope Change to apply PS V3.1.