

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Fagor Ederlan S.Coop. Aluminium Spain

CERTIFICATE NUMBER
552

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM

**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
1 APRIL 2026

DATE OF EXPIRY
31 MARCH 2029

CERTIFIED SINCE
1 APRIL 2026

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

The manufacture of Aluminium automotive components using HPDC and LPDC processes at the Aretxabaleta-Eskoriatza, Bergara, and Arrasate facilities in Spain.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Fagor Ederlan Group
ENTITY NAME	Fagor Ederlan S.Coop. Aluminium Spain
CERTIFICATION SCOPE	The manufacture of Aluminium automotive components using HPDC and LPDC processes at the Aretxabaleta-Eskoriatza, Bergara, and Arrasate facilities in Spain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 12 – 24 November 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 27 February 2026
AUDIT SCOPE	<p>The Audit Scope included the manufacture of Aluminium automotive components using HPDC and LPDC processes at the Aretxabaleta-Eskoriatza, Bergara, and Arrasate facilities in Spain.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Material Conversion <p>All relevant 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> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	1 April 2026 – 31 March 2029
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	31 March 2029
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CERTIFICATE NUMBER	552
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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

Fagor Ederlan S.Coop. Aluminium Spain (the 'Entity') is a co-operative company operating in the Basque Country, Spain, with plants in Eskoriatza-Aretxabaleta, Arrasate and Bergara.

The Entity's main plant is located in Eskoriatza-Aretxabaleta. The Eskoriatza-Aretxabaleta plant has High-Pressure Die Casting (HPDC) capabilities, and in addition it houses a ductile iron foundry and the Group's headquarters. The plant's activities include Aluminium melting, High Pressure Aluminium Die-Casting (HPDC), machining and assembly processes. The plant produces electric motor housings, stator housings, ladder frames, engine blocks, oil pans and transmission housings for the automotive industry. In Eskoriatza, the plant has two melting furnaces and 22 HPDC lines, one shot blasting machine, 24 machining centres and five assembly lines. In the adjacent Aretxabaleta plant, the Entity has two melting furnaces and 18 HPDC lines, two shot blasting machines and five machining centres. The nearby Deba River is considered a sensitive area. The Facility occupies 1.8 hectares and employs approximately 400 workers.

The Entity's Facility in Arrasate is a plant originally dedicated to Low-Pressure Die Casting (LPDC), an activity that continues today. Since 2023, the warehouse has been converted into a machining and assembly plant for HPDC products. This plant carries out processes for Aluminium melting (LPDC), Aluminium casting (LPDC), machining (LPDC), assembly (LPDC), machining (HPDC) and assembly (HPDC). The Facility produces steering knuckles, electric motor housings, and transmission housings for the automotive sector. The plant includes three melting furnaces, six LPDC lines, two T6 heat treatment plants, four LPDC machining centres, two HPDC machining centres and two HPDC assembly lines. The Aramaio River (a tributary of the Deba River) is considered a sensitive area. The Facility occupies 1.12 hectares and employs approximately 70 workers.

The Entity's Facility in Bergara is a plant dedicated entirely to LPDC of Aluminium. The plant's activities include Aluminium melting, Aluminium die-casting (LPDC), machining and assembly processes to produce knuckles for the automotive industry. The plant includes one melting furnace, five LPDC lines, two T6 heat treatment facilities, seventeen machining centres and three assembly lines. There are no sensitive areas identified. The Facility occupies 1.45 hectares and employs approximately 190 workers.

The Entity produces 2.1 million parts between its LPDC facilities in Bergara and Arrasate and 2.5 million parts between its HPDC facilities in Eskoriatza, Aretxabaleta, and Arrasate. Its main Products are Aluminium suspension and propulsion components for Original Equipment Manufacturers (OEMs) of European automobiles.

The main Stakeholders are the residents of Eskoriatza, Aretxabaleta, Arrasate and Bergara, collaborating companies, local administrations and educational and social organisations in the surrounding area.

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	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established a Regulatory Compliance Committee, supported by an independent legal advisor who monitors legislative developments. This Committee meets quarterly and assesses regulatory Compliance, including complaints received through the complaints channel.</p> <p>The Entity has implemented a Compliance risk analysis process that includes legal risks and an action plan for risk mitigation. This analysis is carried out in depth every four years and whenever there are legal developments or complaints. It is evident that no risk is classified as high, and four risks are classified as medium. The Entity has defined sufficient controls to mitigate the risks.</p> <p>The Entity provides training on regulatory Compliance to all employees.</p> <p>The Entity has an integrated quality, environment and safety Management System, which includes a legislative control process based on defined procedures. The Entity demonstrated that there have been no legal breaches or legal Compliance gaps identified in recent years.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Code of Conduct that includes an Anti-Corruption Policy (point 6), including specific commitments and guidelines: https://www.fagorederlan.com/en/documentation</p> <p>A Compliance risk analysis process has been implemented that includes anti-Corruption risks and a risk mitigation action plan. This analysis is conducted in depth every four years and whenever there are legal developments or complaints.</p> <p>Compliance training, including training on the Entity's Anti-Corruption Policy, is provided to all employees by the Social Management Department (Human Resources).</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes sections on relevant environmental, social and economic principles: https://www.fagorederlan.com/en/documentation</p> <p>The Code of Conduct is approved by the Governing Council (equivalent to a Board of Directors). It is reviewed at least every five years, and was revised in 2017, 2021 and 2023.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has defined Policies aligned with the environmental, social and economic principles of the ASI Performance Standard. The Policies are approved by senior management, which supports their implementation by providing the necessary resources. The Policies are reviewed annually as part of the management review process. The Entity communicates its Policies internally through brochures, training and the intranet, and externally through its website: https://www.fagorederlan.com/en/documentation</p>
2.2a-c Leadership	Conformance	<p>The Entity has assigned responsibilities to the General Manager and the management team for the implementation and communication</p>

CRITERION	RATING	COMMENT
		of the Policies, as well as for the provision of resources to implement, maintain and improve the Management System, which is aligned with the ASI Performance Standard. These responsibilities are defined in the Management Manual.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System certified according to the ISO 14001:2015 Standard. This Management System is audited annually by an independent entity. The certificate is available at: https://www.fagorederlan.com/en/documentation
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Health and Safety Management System certified according to the ISO 45001:2015 standard. This Management System is audited annually by an independent entity. The certificate is available at: https://www.fagorederlan.com/en/documentation The Entity, primarily at a Group level, promotes actions that benefit society, Affected Populations and Organisations, focusing on boosting sustainable development activities in the creation of employment opportunities, corporate collaborations with local associations, social sponsorship and charitable donations.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Code of Conduct for Suppliers that is distributed across its supply chain. The purpose of the Code is to define and promote the application of the principles, criteria and standards that govern its suppliers in terms of ethical, legal and sustainable behaviour, and to ensure that they act in accordance with its values and principles. The Entity has implemented a platform-based supply chain assessment system.</p> <p>The Entity has defined general purchasing conditions that are aligned with its Code. It has also defined a Purchasing Policy that is aligned with its Code of Conduct. The Code of Conduct for Suppliers and the Purchasing Policy are available at: https://www.fagorederlan.com/en/documentation</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable as the Entity has no plans for any Major Changes that would require an Environmental or Social Impact Assessment.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable as the Entity has no plans for any Major Changes that would require a Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented an Integrated Management System that is ISO 14001 and ISO 45001 certified that includes an emergency management process and has defined an Emergency Response Plan, also called the Self-Protection Plan. The Self-Protection Plan establishes the methodologies to be followed in the event of potential emergencies that may arise due to its activities and different emergency scenarios.</p> <p>The Entity has notified the relevant authority of the Self-Protection Plan. This authority has published the Self-Protection Plans at: https://www.euskadi.eus/autoproteccion/web01-a2babesa/es/</p> <p>The Self-Protection Plan is also summarised in the local Sustainability Report (ASI Report), page 5: https://www.fagorederlan.com/en/documentation</p>

CRITERION	RATING	COMMENT
		The Entity provides training and informs its employees of the guidelines for action in the event of an emergency and carries out drills to test the effectiveness of the Self-Protection Plan.
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Contingency Plan that defines the systematic course of action to be followed in the event of a special contingency affecting the continuity of supply to customers and/or the suspension of operations.</p> <p>The Contingency Plan defines the person immediately responsible for the implementation of each action and the levels of escalation. Oversight of the Contingency Plan is led by the Director of each plant, and the Plan effectiveness is reviewed and tested annually.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established Articles of Association at the Group/Cooperative level describing the process to be followed regarding mergers and acquisitions. This process is led by the Cooperative's Governing Council, which organises, directs and inspects the Cooperative's short and long-term policies and strategies. It is evident that it has not been necessary to apply this process as there have been no mergers nor acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has defined internal regulations that establish the Board of Directors/Governing Council are responsible for ensuring that environmental, social and economic practices are reviewed in the planning process for closure, decommissioning and divestment events.</p> <p>The Entity has demonstrated that there have been no divestments or closures in recent years, so it has not been necessary to initiate the process.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and its environmental, social and economic impacts annually in its Sustainability Report. This report follows the guidelines of the Global Reporting Initiative (GRI) and includes information on the Entity's environmental, social and governance performance.</p> <p>The Sustainability Report is available at: https://www.fagorederlan.com/en/documentation</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity publicly discloses the results of its Compliance with all applicable legal requirements and any disciplinary proceedings or penalties received in the annual Sustainability Report, section 4.2: https://www.fagorederlan.com/en/documentation</p> <p>The Entity confirms that it has not received any fines or sanctions from relevant authorities in recent years for legal non-Compliance.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented an Anti-Corruption Policy that prohibits payments to political parties or representatives and governments, except for taxes, fees and similar charges.</p> <p>The Entity includes in its Sustainability Report, page 98, a statement indicating that no payments were made to governments or political contributions, whether direct or indirect, financial or in kind, except for</p>

CRITERION	RATING	COMMENT
		<p>taxes, fees and similar charges: https://www.fagorederlan.com/en/documentation</p> <p>The Entity conducts an annual audit of its accounts by an independent entity to confirm the correct payment of taxes and fees, as well as legal Compliance in finance and accounting.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented a process for resolving complaints, claims and requests for information through the Internal Information System, which complies with the requirements of the Whistleblowing Directive and Applicable Law, and is available to Stakeholders at: https://www.fagorederlan.com/es/web/guest/sistema-interno-informacion</p> <p>Access is available to all interested parties. The Entity informs and trains employees in the complaint resolution process to ensure their awareness.</p> <p>The Entity has defined a relevant policy, a manual and established a Compliance Committee to manage complaints received. The system and resources are adequate for managing complaints, claims and requests for information about its operations.</p> <p>The Entity discloses an overview of complaints and reports received, and its response and handling of those complaints in its Sustainability Report, page 36: https://www.fagorederlan.com/en/documentation</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has implemented a procedure for assessing environmental impacts throughout the Product life cycle, developed in conjunction with the University of Mondragón and the Edertek Technology Centre. Through this process the Entity evaluates the environmental impacts of its main Product lines on a 'cradle-to-gate' basis, also considering potential future alternatives.</p> <p>The Life Cycle Assessment (LCA) is based on an original project and it models changes in different variables. An inventory of inputs and outputs is made: products, energy, water, raw materials, waste, emissions, GHG emissions, discharges, etc. at each stage of the process. The methodology is based on reference standards such as ISO 14040, ISO 14067, ISO 59004 and ISO 59020. Reference life cycle data sources such as ECOINVENT 3.9.1 are used.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has made LCA reports available to its customers, although it has not yet received any requests for this information. The methodological basis, limits and underlying assumptions of the assessment are detailed in each LCA report.</p> <p>The Entity has summarised its approach to LCA assessment in its local Sustainability Report (ASI Report), page 5: https://www.fagorederlan.com/en/documentation</p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable as the Entity carries out its operations on a 'build to print' basis, as it manufactures Products exactly as specified in the customer's design documents, drawings and instructions.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented an ISO 14001 certified Management System that includes Aluminium Process Scrap management. All</p>

CRITERION	RATING	COMMENT
		<p>Aluminium Scrap generated in production plants is reused in the plants or recycled via an authorised company for processing and reuse as a raw material.</p> <p>The Entity has a 100% Aluminium Process Scrap recycling rate. Defective parts or Aluminium Scraps are remelted directly in the melting furnaces at each plant.</p> <p>The Entity demonstrated proper management of alloys for recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has implemented an ISO 14001 certified Management System that includes a recycling strategy with specific deadlines, activities and objectives.</p> <p>The Entity manages Aluminium Scrap in accordance with the requirements and procedures established under Applicable Law by the Environmental Authority. The strategy is reviewed annually as part of the management review process.</p> <p>The Entity discloses its recycling strategy in its Sustainability Report, pages 77-80: https://www.fagorederlan.com/en/documentation</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity adheres to and is a member of an integrated packaging management system, ENVALORA, collaborating with local recycling systems.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has implemented an ISO 14001 certified Management System that includes procedures for calculating and accounting for Greenhouse Gas (GHG) emissions and energy consumption.</p> <p>The Entity calculates and publishes its annual performance data regarding GHG emissions and energy consumption by energy source in its annual Sustainability Report, pages 66-74, as well as in disclosures to the Carbon Disclosure Project (CDP). The Sustainability Report is available at: https://www.fagorederlan.com/en/documentation</p> <p>Furthermore, the Entity has disclosed its GHG emissions and energy use by source in the local Sustainability Report (ASI Report), page 6: https://www.fagorederlan.com/en/documentation</p> <p>The Entity verifies energy consumption and emissions data annually through external audits carried out by independent Third Parties, based on ISO 14064-1 and GHG Protocol, ISO 14001, and ISO 50001 standards.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a 2022-2032 Decarbonisation Roadmap with targets established and approved by the Science Based Targets</p>

CRITERION	RATING	COMMENT
		<p>initiative (SBTi) at Group level and aligned with a 1.5°C warming scenario.</p> <p>The Entity has defined targets up to 2032, taking 2022 as the baseline year. Annual and intermediate targets are established. All sources of GHG emissions are considered, including Scope 1, 2 and 3 emissions. The basis for calculation is ISO 14064-1 and the GHG Protocol. The Group level 2022-2032 Decarbonisation Roadmap is available at: https://www.fagorederlan.com/es/medioambiente</p> <p>In addition, the Entity has disclosed a GHG Emissions Reduction Plan at a country level, with Intermediate Targets, developed using the ASI GHG Pathways Method and Calculation Tool. The GHG Emissions Reduction Plan is available in the local Sustainability Report (ASI Report), pages 8 - 9: https://www.fagorederlan.com/en/documentation</p> <p>The trajectory and results of the Entity's GHG emissions reduction performance are detailed in both the local Sustainability Report (ASI Report), pages 6-7, and the Sustainability Report, pages 66-74.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established a 2022-2032 Decarbonisation Roadmap with targets established and approved by SBTi at Group level and aligned with a 1.5°C warming scenario. The roadmap, targets and decarbonisation results are reviewed annually. The Group level 2022-2032 Decarbonisation Roadmap is available at: https://www.fagorederlan.com/es/medioambiente</p> <p>In addition, the Entity has disclosed a GHG Emissions Reduction Plan at a country level, with Intermediate Targets, developed using the ASI GHG Pathways Method and Calculation Tool. The GHG Emissions Reduction Plan is available in the local Sustainability Report (ASI Report), pages 8-9: https://www.fagorederlan.com/en/documentation</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a Management System certified according to ISO 14001 and ISO 50001 Standards. It also manages Carbon Conversion Factor (CCF) emissions according to ISO 14064-1 and calculates Product Carbon Footprint (PCF) emissions according to ISO 14067.</p> <p>The Entity has implemented operational controls to implement and monitor GHG Emission Reduction Plans and energy consumption reduction plans.</p> <p>The Entity develops annual energy action plans with assigned responsibilities, resources and implementation deadlines that include specific actions aimed at reducing its energy consumption. In addition, it monitors the progress of the actions in the energy reduction plan through a committee for each plant. It also develops an annual GHG reduction plan that includes quantified and specific reduction targets for emissions (direct and indirect). The actual reduction percentage achieved is monitored periodically.</p> <p>The Entity has defined environmental indicators associated with energy consumption, secondary material consumption and GHG emissions. These indicators form part of the scorecard used in Management Committee meetings.</p>

CRITERION	RATING	COMMENT
6.1a-f Emissions to Air	Conformance	<p>Each Facility has an Integrated Environmental Authorisation (IEA) granted by the environmental authority that prescribes the legal limits for atmospheric emissions, as well as the frequency and the parameters with which each emission source must be measured.</p> <p>The Entity has implemented a control plan that defines the frequency of controls to comply with the limits established and the measurements to be taken. In addition, it has continuous meters installed in some of the melting points, which are checked weekly. To this end, it uses the best available technologies (BAT) established in the European Union's Best Available Techniques Reference Documents (BREFs). The Entity has established a plan for the next four years to reduce atmospheric emissions and comply with the new limits established in the BREF.</p> <p>The Entity's atmospheric emissions data is published on the website of the Ministry for Ecological Transition: https://en.prtr-es.miteco.gob.es/informes/facilitylevel.aspx</p> <p>The Entity publishes the data on its Emissions to Air in the local Sustainability Report (ASI Report), pages 9-10. The Entity also publishes its atmospheric emissions data and targets at a Group level in its annual Sustainability Report, page 74. Both reports are available at: https://www.fagorederlan.com/es/documentacion</p> <p>The results and targets for atmospheric emissions are reviewed as part of the annual Management System review.</p>
6.2a-g Discharges to Water	Conformance	<p>Each Facility has an IEA that prescribes the legal limits for discharges, as well as the frequency and the parameters with which each discharge source must be measured.</p> <p>The Entity has defined a control plan that defines the frequency of controls to comply with the limits established and the measurements to be taken. To this end, it uses the best available technologies (BAT) established in the European Union's BREFs. The Entity has implemented a plan to control and reduce discharges and comply with the new limits established in the BREF.</p> <p>The Entity's discharge data is published on the website of the Ministry for Ecological Transition: https://en.prtr-es.miteco.gob.es/informes/facilitylevel.aspx</p> <p>The Entity discloses its discharge in the local Sustainability Report (ASI Report), page 10. The Entity also publishes information on its discharges and targets annually in its Sustainability Report, pages 75-76. Both reports are available at: https://www.fagorederlan.com/es/documentacion</p> <p>The results and targets for discharges are reviewed as part of the annual Management System review.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a Management System that includes procedures for managing preparedness and response to any emergency, including environmental emergencies such as Spills and Leakages.</p> <p>Each Facility has carried out an environmental risk analysis in order to identify areas of risk where Spills or Leakages that may affect nearby waterways could potentially occur, and to assess whether the preventive measures in place are sufficient. These risk analyses are reviewed when substantial changes are made to the process areas or</p>

CRITERION	RATING	COMMENT
		<p>facilities. The environmental risk analyses are sent to the relevant environmental authority for validation.</p> <p>In addition, soil condition studies have been carried out to identify areas of risk where Spills or Leakages could potentially affect soil and groundwater, in order to assess whether the preventive measures in place are sufficient. These risk analyses are reviewed every five years. The soil condition studies (included in a single soil report) are sent to the relevant environmental authority for validation.</p> <p>The Entity has summarised its action plan in the local Sustainability Report (ASI Report), page 11: https://www.fagorederlan.com/en/documentation</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>Each Facility has an IEA that includes reporting obligations for incidents, including Spills or Leakages. In the event of an incident or anomaly with potential negative effects on the environment or on the control of the activity, the Entity must immediately report it to the Environmental Authority.</p> <p>In the event of serious incidents or anomalies, and in any case of an accidental Spill or emission, the Entity must notify SOS DEIAK (the Basque Government's public emergency service) and the City Council of the local municipality. Subsequently, a detailed report of the incident must be submitted to the Environmental Authority within a maximum of 48 hours.</p> <p>The Entity will disclose any Spill or Leakage, along with the impact assessment, in the local Sustainability Report (ASI Report), page 11: https://www.fagorederlan.com/en/documentation</p> <p>The Entity confirms that no significant Spills or Leakages incidents have occurred in the reporting period.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Management System that addresses the reuse and recycling of Waste in accordance with the Waste Mitigation Hierarchy.</p> <p>Each Facility has an IEA that includes the obligation to manage all Waste and to prioritise recycling where possible. The Entity manages all Waste in accordance with the requirements and procedures established by the IEA, tracking Waste shipments with authorised Waste management companies and maintaining control records and a system to quantify the Waste generated, recovered, and sent to landfill. Monitoring indicators and objectives have been established.</p> <p>The Entity has a strategy for the reuse of all internally generated Aluminium Waste (defective parts, slag, shavings, and other components) and is seeking recycling options for the remaining Waste generated.</p> <p>The Entity conducts an annual environmental assessment of each plant, which prioritises the Waste for which minimisation actions will be developed.</p> <p>The Entity publishes data on the Waste generated at each plant on the Ministry for Ecological Transition's electronic portal: https://prtr-es.es/Informes/fichacomplejo. The complexes included in the scope are: 4655/4656/4657/10323.</p> <p>Data on the Waste generated is disclosed in the local Sustainability Report (ASI Report), page 12. The Waste Reduction Plan and Group level data is disclosed in the Sustainability Report, pages 79-80. Both</p>

CRITERION	RATING	COMMENT
		reports are available at: https://www.fagorederlan.com/en/documentation
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 has implemented a strategy for the reuse of all slag Waste by seeking recycling options. The Entity demonstrated that it sends slag to an authorised Waste management company that recovers value from it, thus minimising its disposal in landfills.</p> <p>The Entity manages all slag Waste in accordance with the requirements and procedures legally established by the Environmental Authority, tracking slag Waste shipments with authorised Waste management companies and maintaining control records and a system for quantifying Waste generated, recovered, and sent to landfill.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's plants are supplied with water from the public network. Water that is not reused in the production process is discharged into the public sewer system for treatment.</p> <p>The Entity has implemented a Management System that addresses efficient water management. The Entity has defined and implemented a procedure for maintaining an inventory of water sources, identifying their location and type, and conducting an impact analysis through consumption monitoring and setting reduction targets.</p> <p>The Entity conducts an annual assessment of water consumption by source type to evaluate its impact. Additionally, it has assessed the water risks in its Area of Influence, concluding that the risks are low.</p> <p>The Entity has published data on its water abstraction in the local Sustainability Report (ASI Report), page 12. The Entity also publishes its annual data on water consumption by source and type at a Group level in its Sustainability Report, pages 75-76. Both reports are available at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity publishes water consumption data for each plant on the Ministry for Ecological Transition's website: https://ptr-es.es/Informes/fichacomplejo</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as the Entity has assessed the water risks in its Area of Influence, concluding that the risks are low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has undertaken an Environmental Impact Assessment by an independent and competent entity, including a Biodiversity Assessment, to identify risks and the impacts from its operations in its Area of Influence.</p> <p>The assessments determined that there are no high-risk areas, and therefore, the risks and impacts to Biodiversity are rated as low.</p>

CRITERION	RATING	COMMENT
		The analysis of risks and impacts on Biodiversity has been published in the local Sustainability Report (ASI Report), page 14. Although the risks are low, the Entity has defined a commitment to action on Biodiversity, which is published in its Sustainability Report, page 76. Both reports are available at: https://www.fagorederlan.com/en/documentation
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment, undertaken by an independent and competent entity, determined that there are no areas of risk and, therefore, the risks and impacts are rated as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment, undertaken by an independent and competent entity, determined that there are no areas of risk and, therefore, the risks and impacts are rated as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Environmental Impact Assessment, undertaken by an independent and competent entity, determined that there are no areas of risk and, therefore, the risks and impacts are rated as low.
8.4 Alien Species	Conformance	<p>The Entity, in its operations, does not create situations that could lead to the accidental introduction of new exotic species that could affect the environment, the surrounding area, Biodiversity or the ecosystems in which it operates. The risk of receiving raw materials containing exotic species is low. Containers are not received, and all raw materials received undergo heat treatment to eliminate any potentially invasive species that may be present.</p> <p>There are no invasive species present in the landscaped areas.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not carry out any activities or occupy any spaces or areas considered World Heritage Sites.
8.6a-d Protected Areas	Conformance	<p>The Entity does not carry out activities in nor occupy spaces or areas considered as Protected Areas.</p> <p>The Entity has undertaken an Environmental Impact Assessment that determined that there are no areas of risk and, therefore, the risks and impacts are rated as low.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has defined a Code of Conduct, a Sustainability Policy, and a People Policy to respect and support the protection of internationally proclaimed Human Rights in accordance with the United Nations Universal Declaration of Human Rights. The Policies and the Code are reviewed at least every four years or whenever relevant changes occur. The Policies and the Code of Conduct are available internally

CRITERION	RATING	COMMENT
		<p>through the intranet and externally at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented a Due Diligence process, taking into account potentially affected populations, to monitor Human Rights risks and impacts, including from a gender perspective, for both its own activities and in its supply chain. It assesses each risk related to Human Rights, including gender issues, and concludes that there are no high-level risks and that they do not negatively affect the Human Rights of employees, subcontractors, or other Stakeholders.</p> <p>The Entity demonstrates that it does not cause impacts on Human Rights. This is confirmed through complaints received via the ethics channel (Information System), interviews with employees and Stakeholders and visits to the plants.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented a program that promotes gender equality and the empowerment of women through an Equality Plan. The Equality Plan is agreed upon with the employees' legal representatives and includes an analysis of gender-related issues, such as the selection and hiring process, professional classification, training, career advancement and working conditions, including a salary audit between women and men, etc. The Equality Plan is valid for four years and defines a series of actions with implementation dates. The Entity has established an Equality Committee, which meets twice annually to oversee and monitor the progress and commitments of the Plan.</p> <p>As part of its Due Diligence process, the Entity analyses all Human Rights, including those related to women's rights, concluding that the risks are low.</p> <p>The Entity publishes data and progress on the actions outlined in its Equality Plan in its Sustainability Report, pages 41-42, 44, and 46-48: https://www.fagorederlan.com/en/documentation</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable 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 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity does not carry out any activities in nor occupy spaces or areas considered cultural or sacred heritage sites.</p> <p>When the Entity undertakes New Projects or Major Changes, it conducts an Environmental and Social Impact Assessment. The Quality and Environmental Management System provides tools to adequately manage any impact identified on cultural or sacred heritage sites.</p>

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9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable 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 has not caused any displacement. Each Facility has been in the same locations since it commenced operations, and previous changes have been carried out within its operational boundaries and have not involved physical or economic displacement.
9.7a-h Affected Populations and Organisations	Conformance	<p>As part of its Due Diligence process, the Entity analyses its impacts on the legal and customary rights and interests of the Affected Populations and Organisations on an annual basis, concluding that the impacts are minimal.</p> <p>The Entity promotes actions that benefit society and the Affected Populations and Organisations, focusing on boosting sustainable development activities in the Debagoiena region, creating employment opportunities, corporate collaborations with local associations, social sponsorship, and charitable donations. The Entity plans its initiatives on an annual calendar and supports them with personnel and resources.</p> <p>The Entity publishes its community support actions and their results annually in the Sustainability Report, pages 58-64: https://www.fagorederlan.com/en/documentation</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity has implemented a Code of Conduct for Suppliers that is distributed across its supply chain. The purpose of the Entity's Supplier Code of Conduct is to define and promote the application of the principles, criteria and standards that govern its suppliers in terms of ethical, legal and sustainable behaviour, and to ensure that they act in accordance with its values and principles.</p> <p>The Entity has defined general purchasing conditions that are aligned with its Code of Conduct for Suppliers. It has also defined a Purchasing Policy that is aligned with its Code of Conduct. The Code of Conduct for Suppliers and the general purchasing conditions are available at: https://www.fagorederlan.com/en/documentation</p> <p>As part of its Due Diligence process, the Entity annually analyses the risks in its Aluminium supply chain and documents this assessment. The Entity has concluded that it does not source from Conflict-Affected and High-Risk Areas (CAHRAs).</p> <p>The Entity has implemented a supply chain assessment system supported by a platform and defined in a procedure. The assessment includes suppliers of raw materials, components, and auxiliary materials. This platform assesses the risk of sourcing minerals from CAHRAs and evaluates responsible sourcing, using templates developed by the Responsible Minerals Initiative. It also verifies supplier location maps and includes risks by country.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>As part of its Due Diligence process, the Entity annually analyses the risks in its Aluminium supply chain and documents this assessment. The Entity has concluded that it does not source from CAHRAs.</p> <p>The Entity has implemented a supply chain assessment system supported by a platform and defined in a procedure. The assessment includes suppliers of raw materials, components, and auxiliary materials. This platform assesses the risk of sourcing minerals from CAHRAs and evaluates responsible sourcing, using templates</p>

CRITERION	RATING	COMMENT
		developed by the Responsible Minerals Initiative. It also verifies supplier location maps and includes risks by country.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a strategy to address any risks identified in its supply chain. As part of its Due Diligence process, the Entity annually analyses the risks in its Aluminium supply chain and documents this assessment. The Entity has concluded and demonstrated that it does not source from CAHRAs.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion. In addition, the Entity undergoes audits from its clients and certification bodies for its certified standards: IATF, ISO 9001, ISO 14001, ISO 45001, ISO 50001. In turn, it conducts an annual audit of its Non-Financial Information (NFI), which includes environmental, social and governance aspects; this audit is carried out by an independent entity.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity publicly reports on its supply chain Due Diligence process and its results in the Sustainability Report, pages 81-85: https://www.fagorederlan.com/en/documentation
9.9 Security practice	Conformance	The Entity has a contracted security guard provider that has a continuous presence at the gatehouse and entrance to the plants to ensure access control and the protection of people, property, and assets. The security guards do not carry weapons. The security company is authorised by the Police authority. The Entity has demonstrated security personnel have good practices and respect for the Code of Conduct and Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Freedom of Association and right to Collective Bargaining in labour relations. This commitment is defined in the Entity's Code of Conduct, page 10: https://www.fagorederlan.com/es/documentacion The Entity is a cooperative organisation that operates under Applicable Law specific to cooperative organisational structures. A Social Council has been established that is elected by all 'Socios', which are Workers who are members of the Cooperative; the majority of employees are Socios. Non-Socio employees ('TCA') have their working conditions regulated under the metal trade's Collective Agreement of Gipuzkoa, which is available at: https://www.euskadi.eus/gobierno-vasco/-/convenios-colectivos/
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 are no restrictions on the right to Freedom of Association and Collective Bargaining in Applicable Law in Spain.
10.2a-c Child Labour	Conformance	The Entity defines in its Code of Conduct, page 9, that it will not engage in Child Labour and will maintain the necessary records to implement this commitment. The Entity has established a Code of

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		<p>Conduct for Suppliers that prohibits the hiring of children (page 3). This commitment is also reinforced in the People Policy. Both Codes and the Policy are available at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented a personnel management system that records information on the age of Workers that are hired.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity defines in its Code of Conduct, page 8, that it will not use force nor engage in modern slavery. The Entity has established a Code of Conduct for Suppliers that prohibits Forced Labour or modern slavery (page 3). This commitment is also reinforced in the People Policy. Both Codes and the Policy are available at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented a people, security and health Management System that does not allow it to participate in forced work, directly or through employment agencies. It does not require deposits or guarantees, nor does it allow any form of bonded labour. It does not unjustifiably restrict the freedom of movement of Workers in the workplace and does not keep original copies of their identity documents, work permits, travel documents or qualification certificates. Working partners ('Socios') are free to leave the cooperative and Workers may terminate their contract at any time without penalty, subject to a sufficient advance notice period that is defined in employment contracts in accordance with Applicable Law.</p> <p>The Entity has issued a Declaration on Modern Slavery which defines the Due Diligence processes the Entity conducts against modern slavery, both in its own activities and in the supply chain: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has established governance bodies, such as the Social Council, which manage and address all labour matters for Workers, including disciplinary actions. It is evident that disciplinary actions are not conducted outside the Entity's external or internal regulations.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity defines in its Code of Conduct, page 10, that it is committed to promoting diversity, equality and inclusion, to provide the same opportunities in access to work and in professional promotion, ensuring at all times the absence of situations of Discrimination based on sex, sexual orientation, race, disability, illness, religion, or any other circumstance likely to be a source of Discrimination. The Entity has established a Code of Conduct for Suppliers that makes an equivalent commitment to guarantee non-Discrimination (page 4). This commitment is also reinforced in the People Policy. Both Codes are available at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has demonstrated that it hires, remunerates and promotes Workers based on their qualifications and performance. Regarding remuneration, the Entity respects the principle of equal remuneration for work of equal value.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a people, health and safety Management System, which includes a process for participation and consultation of Workers and the use of various channels to communicate with its employees in a systematic and open way, both individually and collectively, about their conditions and problems at work. Workers can communicate and inform themselves via their direct manager or via</p>

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		<p>the Social Council. These channels have sufficient guarantees for open, respectful and diligent communication.</p> <p>The Entity has established a communication process with different communication tools for Workers, such as information panels, a suggestion mailbox, internal queries channel and daily meetings.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity defines in its Code of Conduct, page 12, that it will implement a Management System to prevent Violence in the workplace. The Entity has also established a People Policy that includes a commitment to respect Human Rights and labour conditions in all of its operations, focusing on efforts to reject any form of Discrimination, reprisals or Harassment. Both documents are available at: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented the person, safety and health Management System that includes an action protocol for the prevention of sexual and other Harassment. All employees receive periodic training on the Code of Conduct, which addresses Violence and Harassment in the workplace. The Entity publicly reports relevant compliance incidents as well as its initiatives to prevent Violence and Harassment in its Sustainability Report: https://www.fagorederlan.com/en/documentation</p>
10.7a-c Remuneration	Conformance	<p>The Entity is a cooperative organisation that has defined agreements with Workers, including rights and working conditions, which are reflected in the internal cooperative regulations. Non-Socio employees have their salaries and other working conditions regulated under the metal trade's Collective Agreement of Gipuzkoa, which is available at: https://www.euskadi.eus/gobierno-vasco/-/convenios-colectivos/</p> <p>The Entity has implemented a People Policy that includes the commitment to recognise the right to rest and leisure of Workers, in accordance with laws, regulations and/or local customs: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented a payment process that records the payment of monthly salaries in accordance with current legislation, including detailed information on all payments. The Entity makes payments in legal tender currency. This process includes payment for Overtime as necessary.</p>
10.8a-c Working Time	Conformance	<p>The Entity is a cooperative organisation that has defined agreements with Workers, including rights and working conditions, which are reflected in the internal cooperative regulations. Non-Socio employees have their working hours and other conditions regulated under the metal trade's Collective Agreement of Gipuzkoa, which is available at: https://www.euskadi.eus/gobierno-vasco/-/convenios-colectivos/</p> <p>The Entity has implemented a People Policy that includes the commitment to recognise the right to rest and leisure of Workers, in accordance with laws, regulations and/or local customs: https://www.fagorederlan.com/en/documentation</p> <p>The Entity has implemented a process to the number of hours worked by each employee and to ensure compliance. The working day for employees does not exceed eight hours on average over a six-month period and employees have at least one free day in a seven-day period.</p>

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10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers about their rights through various documents including social statutes and internal cooperative regulations, in addition to the Code of Conduct. The Entity has established communication channels, including employee meetings and partner meetings, which all employees must attend.</p> <p>The Entity ensures that all employees are aware of their rights during the 'employment plan', as part of new employee onboarding. All relevant documentation is available to all Worker both on the intranet and on the company app ('Ederapp').</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Safety and Health (OH&S) Management System that is certified to the ISO 45001 Standard. This Management System is audited annually by an independent entity.</p> <p>The Entity has assigned responsibilities and functions within the organisation regarding OH&S. The Entity has provided support resources to maintain and improve OH&S and has defined procedures and operating instructions to carry out operations safely. This Management System also considers subcontractors.</p> <p>The Entity has defined operational control procedures, such as inspections and maintenance of equipment. It offers procedures for monitoring the health of its workers as well as managing incidents and accidents. The Entity provides personal protective equipment for its Workers.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented an Occupational Safety and Health (OH&S) Management System that is certified to the ISO 45001 Standard. The Entity has established indicators to monitor the effectiveness of OH&S measures based on a control and measurement procedure.</p> <p>The Entity reviews its OH&S Management System annually through a management review process. In a complementary way, the Health and Safety Committee reviews the most relevant OH&S aspects every month. The Entity's OH&S Management System is audited annually both by an independent organisation and through internal audits.</p> <p>The Entity evaluates OH&S risks and updates them every time changes are made to the facilities or working conditions. The evaluation includes psychosocial risks and hygiene measurements.</p> <p>The Entity publicly discloses the effectiveness of the OH&S Management System in the annual Sustainability Report, pages 49-54, including leading and lagging indicators and a comparative analysis with the sector. In addition, the effectiveness indicators for the OH&S Management System and comparative analyses have been published in the local Sustainability Report (ASI Report), page 17. Both reports are available at: https://www.fagorederlan.com/en/documentation</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented an OH&S Management System that includes mechanisms to discuss OH&S issues with Workers and their representatives.</p> <p>The Entity has implemented a participation and consultation procedure to guarantee the participation of Workers through the</p>

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		appointment of prevention delegates and the establishment of a Health and Safety Committee to supervise the effectiveness of the Management System and discuss OH&S concerns with Workers and their representatives. The Health and Safety Committee meets monthly with prevention delegates in attendance.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 April 2026	Initial Certification Audit – Full Certification