

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TRIMET Aluminium SE (Essen)

CERTIFICATE NUMBER
272

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM

**TÜV NORD CERT
GmbH**

DATE OF ISSUE
14 APRIL 2026

DATE OF EXPIRY
13 APRIL 2029

CERTIFIED SINCE
14 APRIL 2023

AUTHORISED BY

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

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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

Development, manufacture and sale of alloy in the form of slabs and ingots and production of molten Aluminium at Trimet located in Essen, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET Aluminium SE (Essen)
CERTIFICATION SCOPE	Development, manufacture and sale of alloy in the form of slabs and ingots and production of molten Aluminium at Trimet located in Essen, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (7 – 11 November 2022)Re-Certification Audit (18 – 20 November 2025)
AUDIT FIRM	TÜV NORD CERT GmbH
AUDIT DATE	<ul style="list-style-type: none">7 – 11 November 2022 (Initial Certification Audit)18 – 20 November 2025 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 March 2023 (Initial Certification Audit)27 January 2026 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (7 – 11 November 2022)</u></p> <p>The Audit Scope includes the development, manufacture and sale of alloy in the form of slabs and ingots and production of molten Aluminium at Trimet Essen, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit (18 – 20 November 2025)</u></p> <p>The Audit Scope includes the development, manufacture and sale of alloy in the form of slabs and ingots and production of molten Aluminium at Trimet Essen, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY
DECLARATION

The Auditors confirm that:

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

14 April 2026 – 13 April 2029

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

13 April 2029

CERTIFICATE NUMBER

272



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

TRIMET Aluminium SE (the 'Entity') operates a Primary Aluminium production and a Casthouse to produce alloyed and unalloyed Aluminium products at its site in Essen, which are used in the automotive, packaging, energy and construction industries. The approved production volume is 200,000 metric tonnes of primary metal with a total capacity of 315,000 metric tonnes of Aluminium per year. The site is located in Essen-Borbeck and covers an area of approximately fifty hectares. The Entity currently employs approximately 850 people.

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	The Entity has implemented processes that facilitate the adequate awareness of legal requirements and ensure Compliance with Applicable Laws and regulations. At a corporate level, legal developments are systematically monitored, and competent legal advice is available. The Entity's management confirmed that there were no legal violations in the previous Certification Period.
1.2 Anti-Corruption	Conformance	Policies and processes have been developed and implemented to identify and prevent Corruption. Designated guidelines and processes for identifying and preventing Corruption are also provided to employees as part of the Entity's training framework. Annual risk analyses have been undertaken and registers are in place. In the previous Certification Period, there was one case of suspected Corruption.
1.3a-e Code of Conduct	Conformance	A Code of Conduct, a Human Rights Code and a Supplier Code which address environmental, social and governance (ESG) principles are available for all Stakeholders on the TRIMET website, available at: https://www.trimet.eu/en/trimet/compliance
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's integrated management Policy is consistent with the ESG requirements of the ASI Performance Standard. This Policy is adequately communicated on the TRIMET website at: https://www.trimet.eu/fileadmin/downloads/en/Codex/TRIMET_Corporate_Policy_2023.pdf This Policy has been endorsed by senior management and is periodically reviewed. Responsibilities are also defined and adequate resources are provided
2.2a-c Leadership	Conformance	A Board Member of TRIMET Aluminium SE has the overall responsibility and authority to ensure conformance of the Entity with the ASI Performance Standard, with adequate resources provided.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented and documented an Environmental Management System and holds a valid DIN EN ISO 14001:2015 certificate, available at: https://www.trimet.eu/en/downloads/certificates
2.3b Environmental and Social Management Systems – Social	Conformance	A Social Management System is incorporated into the implemented Occupational Health and Safety (OH&S) Management System, TRIMET's compliance system and TRIMET's Human Rights code. The Entity has an implemented and documented OH&S Management System and holds a valid DIN ISO 45001:2018 Certificate.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and communicated its Responsible Sourcing Policy and its Supplier Code of Conduct, which addresses ESG issues. The Code of Conduct is available at: https://www.trimet.eu/en/trimet/compliance/supplier-code-of-conduct and the Responsible Sourcing Policy is available at:

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		<p>https://www.trimet.eu/fileadmin/downloads/de/zertifikate/Guideline_f_or_responsible_procurement.pdf</p> <p>The Entity has also established documented processes for risk assessments and evaluation to implement these Policies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no significant changes or New Projects over the previous three years.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no significant changes or New Projects over the previous three years.
2.7a-f Emergency Response Plan	Conformance	As part of the Entity's Environmental Management System, an Emergency Response Plan has been implemented. The Entity has implemented the Emergency Response Plan and provided training to relevant personnel. External Stakeholders including the Local Community and relevant authority were involved in the development of the Plan. Regular training sessions are held with employees. Relevant Stakeholders (including Local Authorities) can access the Emergency Response Plan upon request.
2.8a-d Suspended Operations	Conformance	Management requirements relating to suspending operations is directed at the Board level of TRIMET with the support from internal and external lawyers and other external experts.
2.9a-b Mergers and Acquisitions	Conformance	Management requirements relating to merger and acquisition activity is directed at the Board level of TRIMET with the support from internal and external lawyers and other external experts.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning requirements are established in German Law. Closure and decommissioning activities are fulfilled at the Board level of TRIMET Aluminium SE.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared its Sustainability Report 2023 in accordance with the GRI Sustainability Reporting Guidelines, available at: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf
3.2 Non-compliance and Liabilities	Conformance	Violations and liabilities related to ESG matters are reported in the Sustainability Report, which addresses the entire Entity, in accordance with GRI 2-27. Refer to: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf No violations or liabilities were identified during the reporting period.
3.3a-c Payments to Governments	Conformance	Payments to governments did not take place at the Entity, except for taxes and fees levied according to German laws and regulations. Refer to: https://www.lobbyregister.bundestag.de/startseite
3.4a-f Stakeholder Complaints, Grievances	Conformance	All Stakeholders have opportunity to submit complaints, grievances and requests for information in person or online at any time. External

CRITERION	RATING	COMMENT
and Requests for Information		communication is managed by TRIMET's Public Communication department. In addition, the Entity has established a web-based 'whistleblower' system - TRIMET Integra - which enables Stakeholders to report complaints, available at: https://www.trimet.eu/de/trimet/compliance/trimet-integra
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	A Life Cycle Assessment (LCA) of the production of unalloyed ingot/sow/slab/T-bar, alloyed slab, alloyed billet and primary foundry alloy (PFA) ingot, has been undertaken to calculate the environmental impact of Aluminium Products from 'cradle to gate'. The LCA has been prepared in accordance with both ISO 14040 and ISO 14044 requirements.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA can be provided to interested Stakeholders by the Entity's management as required.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	All internal Scrap is collected and recycled. Aluminium Process Scrap is targeted and monitored through the whole process chain. There are objectives, plans and projects to achieve further reduction of process Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity supports various activities of associations, including European Aluminium and Aluminium Deutschland to promote recycling of end-of-life products. The Entity cooperates with customers to collect Scrap and realise its closed-loop strategies.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Direct CO ₂ Scope 1 and 2 emissions data are made available as part of the Sustainability Reporting process. These data are independently verified. Energy consumption is also reported as part of TRIMET's Sustainability Reporting process. Scope 3 emissions are determined and verified as part of the Product Carbon Footprint (PCF) calculation and are made available to the customer on request. Refer to the Sustainability Report 2023: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf GHG-Reduction Pathway and Reduction Plan, pages 26 and 28: https://www.trimet.eu/fileadmin/downloads/de/GHG_Reduction_Plan_TAE_2026.pdf
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity, as it commenced production before 2020.

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Started production after 2020		
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has demonstrated that GHG emissions for Aluminium Smelting are 10.9 t CO ₂ e.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has developed a GHG Emissions Reduction Plan, or 'Decarbonisation Roadmap', which outlines a GHG Emissions Reduction Pathway that is aligned with the ASI Pathway Calculation Tool ensuring consistency with the 1.5°C warming scenario. Refer to: https://www.trimet.eu/fileadmin/downloads/de/GHG_Reduction_Plan_TAE_2026.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity's emissions targets are documented and tracked in the energy and environmental programme and in the Entity's Key Performance Indicator (KPI) profile. An emissions reduction plan is publicly available, and the Entity has recently completed its pathway development exercise, using the ASI Pathway Calculation Tool to determine the GHG reduction plan and pathway with 2024 as the baseline year.</p> <p>The Entity has used 2029 as an interim target, and according to the ASI approach, GHG emissions are to be reduced by 18 percent (CO₂/t Al) by the end of 2029. It has derived their decarbonisation pathway and reliable and verifiable measures to reach 'five-year step goals' based on the results of the tool.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy and Environmental Management System according to DIN EN ISO 50001:2018 and DIN EN ISO 14001:2015 and a process and controls to achieve performance aligned to the GHG Emissions Reduction Plan and targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Relevant emissions are continuously measured and monitored according to legal requirements. Programs to reduce emissions are in place as part of the Environmental Management System. Relevant emissions are reported annually in the Sustainability Report 2023, pages 28-29: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf</p> <p>The Entity measures its Emissions to Air and reports to the local environment authority on a daily basis. If externally mandated limits are exceeded, the relevant local authority will be informed, and corrective actions will be implemented.</p>
6.2a-g Discharges to Water	Conformance	<p>Relevant emissions are continuously measured and monitored and emissions are within the legally prescribed limits. Rainwater and wastewater are collected and discharged separately.</p> <p>Rainwater is cleaned and discharged into the surface water in a 'throttled' (flow controlled) manner. Relevant water data are disclosed in the Sustainability Report 2023, page 27: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf</p>

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6.3a-g Assessment and Management of Spills and Leakages	Conformance	An assessment and management of major risk areas of operations where Spills and Leakage may contaminate air, water and soil is undertaken by following the risk assessment process of Environmental Management System. The Entity confirmed that during the reporting period, there were no relevant Spills, Leakages or similar incidents.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Any reportable Material releases and remedial actions implemented are reported in the Sustainability Report 2023, page 5: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf There were no significant releases in the reporting period.
6.5a-c Waste Management and Reporting	Conformance	Waste management requirements are obligated by German law and are incorporated into the Environmental Management System. Relevant waste data are shown in the Sustainability Report 2023, pages 24 and 29: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf The Entity has managed its waste in accordance with the Waste Mitigation Hierarchy.
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)	Conformance	All Spent Pot Lining (SPL) is separately collected and stored in a closed shed until proper disposal to prevent their release into the environment. This is verified by the relevant authority. SPL is collected and stored separately in two fractions. The first cut (carbon lining) is used as a substitute fuel in the mineral wool industry. The second cut (refractory) is fully recycled, depending on the availability of capacity at the disposal companies. SPL is treated with water. The wastewater produced is treated in a separate wastewater treatment plant. The basic aim is to recycle or reuse 100% SPL. Due to limited capacities for SPL second cut, some SPL had to be disposed of. Apart from this, further disposal options are constantly being sought on an annual basis. There is no SPL discharged into marine and aquatic environments.
6.8a-d Dross	Conformance	Dross is stored in containers in covered storage areas and transported to the disposal facility in closed containers. Dross from internal processes is 100% remelted or recovered at the TRIMET Aluminium SE, Gelsenkirchen site. As Dross is 100% recycled, it does not require disposal. There is no requirement to assess a need for alternative options.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	Water withdrawals and sewage disposal is measured and monitored and disclosed in the Sustainability Report 2023, pages 18, 20 and 27: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf There are no process waters generated and disposed off-site.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water-related risks identified are assessed and documented as low.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Impact Assessments are a component of the legal framework in Germany that is mandatory to gain permission to operate and are also incorporated into the Environmental Management System. The Entity has developed and implemented systems and processes to conduct Impact Assessments for Biodiversity and Ecosystem Services. The outcome of the Biodiversity and Ecosystem Services is also a part of the respective approval of the District Government. No particular risks to Biodiversity and ecosystem services have been identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services relevant to Affected Populations have been identified.
8.4 Alien Species	Conformance	The Entity proactively prevents the introduction of Alien Species by ensuring that the main carrier medium (wood) is processed in a way to avoid the transport of such species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that it is not operating in, or near a Protected Area or World Heritage Property.
8.6a-d Protected Areas	Conformance	The Entity is located in an industrial zone, which has been in operation for approximately 90 years. There are no Protected Areas within the direct vicinity of the Entity. The nearest Protected Area is approximately one kilometre away. The Sustainability Report 2023 (page 19) commits to the Entity not operating in or near a Protected Area.
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 commitment to the preservation of Human Rights can be found in TRIMET's Human Rights Code, available at: https://www.trimet.eu/en/trimet/compliance/code-of-human-rights The Entity has conducted a documented Human Rights Due Diligence assessment. Human Rights impacts are assessed by a risk-based approach. To date, no major impact on Human Rights has been identified.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity communicates within its Code of Conduct, Human Rights Code and Supplier Code, its commitment to non-Discrimination of

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		<p>women and promotes Women's Empowerment Principles. Refer to: https://www.trimet.eu/en/trimet/sustainability/gender-equality</p> <p>A Policy to foster gender equity and women's empowerment has been established and the Entity is currently working on its implementation. The works council ensures that women are not disadvantaged in recruitment.</p> <p>Information on the effectiveness of the measures taken to promote gender equity is publicly available in Sustainability Report 2023, refer to GRI 405: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as it has assessed, and confirmed that there are no Cultural and Sacred Heritage sites present 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 it has assessed, and confirmed that there are no Cultural and Sacred Heritage sites present within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it was confirmed during the Audit that its operations have not displaced any vulnerable or at-risk individuals present in its Area of Influence.
9.7a-h Affected Populations and Organisations	Conformance	The outcome of the Human Rights Due Diligence conducted has not identified the presence of related issues affecting Local Communities. The Entity is located within an industrial area.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>Procurement and responsible sourcing are managed at the corporate level of TRIMET in Essen, Germany, and the Entity is committed to providing supply chain transparency in accordance with Applicable Laws and regulations, including the <i>German Supply Chain Act</i>.</p> <p>The Entity is incorporated into the TRIMET Management System at the corporate level to avoid any involvement in armed conflict or Human Rights abuses including a Policy, the definition of responsibilities and attribution of resources, a documented Due Diligence procedure, the collection of information regarding suppliers, and a Grievance Mechanism. Refer to:</p>

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		https://www.trimet.eu/fileadmin/downloads/de/zertifikate/Policy_for_Conflict-Affected_and_High-Risk_Areas_CAHRAs_-_2024.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	Facilitated by TRIMET Corporate, the Entity has implemented a Due Diligence procedure that includes the identification and assessment of Conflict-Affected and High-Risk Areas (CAHRAs)-related risks in its supply chain. Risks have been assessed for all relevant suppliers, considering different resources.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	Facilitated by TRIMET Corporate, the Entity has implemented a Policy that prescribes the processes to respond to identified CAHRAs-related risks in its Aluminium supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports annually on its supply chain Due Diligence regarding CAHRAs in its Modern Slavery Statement, available at: https://www.trimet.eu/en/downloads/sustainability
9.9 Security practice	Conformance	The Entity's external service provider for on-site security ensures respect for Human Rights and trains its employees accordingly.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Based on the Collective Bargaining Agreement for the chemical industry in Germany (IGBCE), the Entity has developed additional agreements between itself and the Works Council which are valid for all employees. The Entity has a well-established Works Council, in accordance with German law.
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 Freedom of Association and the Right to Collective Bargaining are not restricted in Germany where the Entity conducts its activities.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in Germany. Young employees aged 16 to 18 years are subject to special legal protections and are not allowed to work in hazardous working conditions. Employees and managers are aware of these legal regulations.
10.3a-c Forced Labour	Conformance	The Entity commits itself to respect Human Rights and expects its suppliers to do the same. The Entity only works with trustworthy employment agencies, and is not involved in Forced Labour, neither direct nor through recognised labour agencies. Neither deposits nor security payments are required. TRIMET's Modern Slavery Statement is available at: https://www.trimet.eu/fileadmin/downloads/de/Berichte/Modern_Slavery_Statement_2025-EN.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in the TRIMET Human Rights Code and the respective

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		<p>Policy. The Entity expects the same from its suppliers via a commitment to its Supplier Code. The German <i>General Equal Treatment Act (AGG)</i> prohibits Discrimination in connection with six specific characteristics.</p> <p>In addition, discussions and interviews were held with randomly selected employees during the audit confirmed there are no complaints regarding Discrimination.</p>
10.5 Communication and engagement	Conformance	<p>Direct and frequent communication with all employees and the Works Council is established. A web-based whistleblower system - TRIMET Integra - is implemented. Refer to: https://www.trimet.eu/de/trimet/compliance/trimet-integra</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity prohibits Violence and Harassment at all times and has implemented a Policy against Violence and Harassment. The Entity has stipulated in its Human Rights Code that it does not tolerate Harassment, Violence or Discrimination against its employees. Refer to: https://www.trimet.eu/fileadmin/downloads/de/Kodex/TRIMET-Human_Rights_Code-EN-2026.pdf</p>
10.7a-c Remuneration	Conformance	<p>All wages are regulated through the Collective Bargaining Agreement of the chemical sector which are considerably higher than the statutory minimum wage in Germany. All payments are made on time and are documented and submitted at the end of the month to the employees' nominated bank accounts.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is specified in each employment contract. A 'clocking-in' system is in place and records are accessible.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity regularly informs employees of their rights during the onboarding process, via communication channels and through the Human Resources Department. Works Council and Union representatives are also important sources of information regarding employees' rights.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity's Occupational Health and Safety (OH&S) Management System is certified to ISO 45001, refer to: https://www.trimet.eu/en/downloads/certificates</p> <p>The Entity has implemented an Occupational Health and Safety (OH&S) Policy that has been communicated to employees and is reviewed and revised as required. The ISO Auditor reviews the requirements of the ISO 45001 Standard on an annual basis, which includes the provision of resources by the management board.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The effectiveness of the OH&S Management System is annually reviewed by senior management. OH&S performance indicators are made publicly available in the Sustainability Report 2023, pages 31-34: https://www.trimet.eu/fileadmin/downloads/trimet-nachhaltigkeitsbericht-2023-de.pdf</p> <p>OH&S statistics are compared annually with international companies in this sector via European Aluminium. These statistics are made</p>

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		available to all facilities. In an international comparison, the figures are currently still above average. As part of the cross-site 'Vision Zero' campaign, many processes and structures have been standardised and optimised across the Entity which has led to the creation of a 'cross-site' accident reporting system in which each site within TRIMET is compared with each other daily.
11.2 Employee engagement on Health and Safety	Conformance	Formal cooperation between the Entity's management and its employees is in place. The Entity meets the legal requirements and has formed an Occupational Safety Committee that meets on a quarterly basis. The Entity's management discusses the topics relevant to Health and Safety with the Works Council, the Entity's physician, Safety Officers and other persons and defines goals and measures that are pursued in this Committee.

ASI LIMITATION OF LIABILITY DISCLAIMER

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	14 April 2023	Initial Certification Audit - Full Certification
1	14 April 2026	Re-Certification Audit - Full Certification. Scope Change to apply ASI PS V3.1.