

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Ciclo Fapril – Indústrias Metalúrgicas, S.A.

CERTIFICATE NUMBER
548

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
2 MAY 2026

DATE OF EXPIRY
1 MAY 2029

CERTIFIED SINCE
1 MAY 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
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

Production of Aluminium
components at the Alufap facilities
in Águeda, Portugal.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ciclo Fapril - Indústrias Metalúrgicas, S.A.
ENTITY NAME	Ciclo Fapril - Indústrias Metalúrgicas, S.A.
CERTIFICATION SCOPE	Production of Aluminium components at the Alufap facilities in Águeda, Portugal.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">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">4 – 6 November 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">25 February 2026
AUDIT SCOPE	<p>The Audit Scope includes the production of Aluminium components at the Alufap facilities in Águeda, Portugal.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">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	2 May 2026 – 1 May 2029
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE 2 November 2027

CERTIFICATE NUMBER 548



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

Ciclo Fapril commenced operation in 1965, to meet the requirements of the bicycle and motorcycle sector in Portugal. During the 1970s, the automotive sector emerged in the country, and the Entity immediately began supporting this sector also, and since that time it has increased its customer base into other sectors. It currently manufactures welded metal components, through sheet metal stamping and bending, tube and wire cutting and bending, and turning and machining.

Ciclo Fapril's Alufap facilities (the 'Entity') is located in an industrial area of Águeda, Portugal and operates one production line for the automotive sector, consisting of an automatic saw, two hydraulic stamping presses, a washing/degreasing tunnel, two welding robots, and a final calibration station. The manufacturing operations for bicycle components and other parts include 2D laser cutting, bending, stamping presses, 5-axis and 3-axis machining centres, two washing/degreasing lines, robotic MIG welding facilities, laser welding, T4 and T6 heat treatment, polishing, and an electrostatic powder coating line (currently inoperative at the time of the Audit). Facilities related to production include six industrial warehouses, with production areas and storage zones for raw materials, components, intermediate stock, and finished products. The total operational area of the Entity is approximately 2.2 hectares (ha).

Ancillary facilities present at the Entity include a main administrative building and training academy medical facility, Worker facilities (lockers and bathrooms) and a canteen. There is also a car parking area for employees and Visitors, and a waste storage area. A photovoltaic power generation plant is present on site. At the time of the Audit, the Entity employed 30 persons.

There are no special protection areas within or adjacent to the Entity's Area of Influence, and the nearest residential area to the Entity is Águeda, located approximately four kilometres from the Entity. The main external Stakeholders for the Entity include the Portuguese Government, the municipal government of Águeda and the local city of Águeda, the Portuguese environmental and labour authorities, and the sectoral association ABIMOTA.

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	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	High	High	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented a Quality and Environmental Management System based on both ISO 9001 and ISO 14001 Standards, certified by an independent third party, which includes a process for monitoring the legislation applicable to the Entity.</p> <p>The Entity regularly undertakes the identification, assessment and a compliance assessment with relevant Applicable Laws. External expert advisors and reference bulletins alert the Entity to legal developments and their application. No critical gaps in legislation are noted or reported at the time of the Audit.</p> <p>The Entity includes legal compliance review processes as part of annual audits and senior management reviews.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity has implemented an anti-Corruption processes and procedures, which includes a plan to prevent the risks of Corruption and related crimes. The Entity's anti-Corruption plan is reviewed twice annually and published at: https://ciclofapril.pt/wp-content/uploads/2025/11/PPRC-PT.pdf</p> <p>The Entity certifies the training provided to employees on anti-Corruption as part of the training on the Code of Conduct. This training is provided to employees and is made available as information to Contractors and other interested parties.</p> <p>The Entity has implemented a whistleblowing channel that is published at: https://ciclofapril.pt/pt/comunicacao-de-irregularidades/</p> <p>Whilst a compliance risk assessment process has been defined and is currently underway, it has not yet been completed.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct for employees, which is available at: https://ciclofapril.pt/wp-content/uploads/2024/06/CEC-PT-2.pdf</p> <p>The Code establishes the governance, environmental and social principles applicable to employees. A separate Code of Conduct for suppliers is available at: https://ciclofapril.pt/wp-content/uploads/2025/10/Código-de-conduta-de-Fornecedores_20251008.pdf</p> <p>This Code sets out the governance, environmental and social principles specifically applicable to the Entity's supply chain.</p> <p>Employees receive information and training on the Code. Interviews with Stakeholders and employees undertaken during the Audit confirm that they are aware of the Code and comply with its guidelines and principles.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has defined a Sustainability Policy to integrate sustainability principles into all areas of business, continuously improving our environmental, social and economic performance. This Policy is included in the Sustainability Report 2024, page 12: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-</p>

CRITERION	RATING	COMMENT
		<p><u>2024-PT.pdf</u></p> <p>The Entity has implemented a Quality and Environmental Management System that includes the definition of a Management Policy, which has approved by senior management. The Management Policy is available: https://ciclofapril.pt/pt/qualidade-e-ambiente/politica-de-qualidade-e-ambiente/</p> <p>An 'Ethics, Human Rights and Whistleblowing Policy' has been defined and implemented, approved by management. This Policy defines the fundamental ethical principles and is available at: https://ciclofapril.pt/wp-content/uploads/2025/11/PEDHD-PT.pdf</p> <p>These Policies are reviewed as part of the Entity's Management Review process. Training on the Policies is provided as part of the Code of Conduct training and is provided to employees and made available as information to Contractors and other interested parties.</p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed the Environment, Occupational Health and Safety (OHS) and Sustainability Director to be responsible for the implementation of the ASI Performance standard requirements and obligations. This appointment is recorded in the Functions and Responsibilities Manual.</p> <p>Management conducts an annual review to assess the effectiveness and improvement needs of the Management System and to define the resources required for improvement.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented an Environmental Management System which is based on the ISO 14001 standard. This Management System is certified by APCER and independent external audits are undertaken annually. The current certificate is available at: https://ciclofapril.pt/pt/certificados</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has assessed social-related risks and opportunities. Roles and responsibilities have been defined, and there is evidence of actions in the areas of social action, Health and Safety, and Human Rights. The results to be achieved in social actions have been defined and are monitored, but no indicators have been described in writing to complete the information on the effectiveness of the Social Management System.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Supplier Code of Conduct, available at: https://ciclofapril.pt/wp-content/uploads/2025/10/Código-de-conduta-de-Fornecedores_20251008.pdf</p> <p>This Code establishes the governance, environmental and social principles applicable to the supply chain and is communicated to suppliers.</p> <p>A supplier evaluation process based on a sustainability questionnaire has been defined. An evaluation record is maintained for raw material suppliers and service providers. The distribution and receipt of the Supplier Code of Conduct is monitored.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there have been no significant changes or New Projects over the previous three years.</p>

CRITERION	RATING	COMMENT
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	<p>The Entity has defined a Management System that includes an emergency management process. Risk scenarios have been identified, and the needs of Stakeholders and the participation of employees and other community agents have been considered. A control plan with emergency risk containment measures has been defined and communicated to the public by sending it to the local authority, ANEPC (ANEPC - Autoridade Nacional de Emergência e Proteção Civil), and is available at: https://www.gov.pt/entidades/autoridade-nacional-de-emergencia-e-protecao-civil</p> <p>Employees receive training on emergency measures and emergency drills are undertaken regularly to verify the effectiveness of the emergency plan.</p>
2.8a-d Suspended Operations	Conformance	The Entity has defined a contingency plan that contemplates the actions to be taken in the event of various events, including the suspension of operations and their governance, environmental and social impacts. There have been no operational suspension events to date.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has defined a mergers and acquisitions process that considers practices in line with the ASI Performance Standard and historical operations in the Aluminium sector. There have been no mergers or acquisition events to date.
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	The Entity has defined a contingency plan for Closure, Decommissioning and Divestment. Although it is not expected that a specific plan will need to be implemented in the short term, the process has not been formally defined.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has produced a Sustainability Report that includes its strategy and impact in the areas of governance, the environment and social issues. The Sustainability Report is produced annually and available at: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity's Sustainability Report 2024 (page 27) outlines the issues related to legal non-compliance or sanctions received. Refer to: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf
3.3a-c Payments to Governments	Conformance	The Entity has defined in its Code of Conduct a commitment to ethical practices, including transparency in reporting payments to governments, such as taxes, fees and royalties. The audit shows that no payments are made to governments beyond those legally required for taxes or permits. The approach to governance and its commitment to transparency is available in the Sustainability Report 2024, page 11: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible channel to receive and track complaints, claims and requests for information from interested parties, available at: https://ciclofapril.pt/pt/comunicacao-de-irregularidades/</p> <p>No complaints or requests were received in 2024, and one received in 2025, which was resolved with a positive outcome.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has defined and implemented a procedure with methodologies to identify the main Product lines in which Aluminium is considered or used, and to assess the life cycle impacts. This is undertaken by evaluating environmental aspects from a life cycle perspective, however, product transport to customers and the end of the products' useful life are not yet included in the methodologies used by the Entity.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has defined a list of the main Product lines for which Aluminium is considered or used. It has produced a documented Life Cycle Assessment (LCA) Report for the main Product lines. Its strategy on LCA improvement is defined in the Sustainability Report 2024, page 34: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has defined an environmental management strategy that is deployed in a plan for the systematic management of waste streams and the use of effective separation controls, investment in trained personnel and equipment. It is evident that 100% Aluminium Scrap generated is recycled and that the different Scrap alloys are separated by type.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity's recycling strategy is described and made publicly available in the Sustainability Report 2024, pages 33-34: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>Objectives and action plans have been defined to improve the efficacy of the recycling strategy over time.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is an active participant in industry associations including Shift Cycling Culture and ABIMOTA, which promote the search for better sustainability solutions and participation in initiatives.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity calculates and reports Greenhouse Gas (GHG) emissions segmented by energy type and source. GHG emissions data are presented in the Sustainability Report 2024, pages 36-38: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>Calculations and emissions data are verified by a competent and independent body.</p>

CRITERION	RATING	COMMENT
		Scope 3 emissions data have not, however, been published in the 2024 Sustainability Report.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG reduction and energy efficiency plan, which is currently being implemented, and has developed a GHG Emissions Reduction Plan and a GHG Emissions Reduction Path consistent with 1.5 °C, in accordance with both SBTi and ASI methodologies. Investment needs have been identified and are being implemented.</p> <p>The Entity has used the ASI Entity GHG Pathways Method and Calculation Tool to calculate their emissions intensity in relation to its established GHG Trajectory.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The Entity's emissions reduction trajectory, targets and reduction plan are defined in the Sustainability Report 2024, pages 18, and 36-38: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>The Entity has committed to reducing emissions by 29.4% by 2026 (compared to 2019) and, as part of its commitment to being a member of 'Shift Cycling Culture', has set a reduction target of 55% by 2030. Scope 3 emissions have not been included in the emissions reduction trajectory however, and no formal targets have been set beyond 2030.</p>
5.4 GHG Emissions Management	Conformance	The Entity has defined and implemented a GHG emissions management process that includes the control of GHG emissions and energy consumption through detailed monitoring records. Emissions reduction initiatives are recorded in action plans, integrating specific targets and actions to achieve the targeted reductions. Results, targets and action plans are assessed annually in the management review of the Environmental Management System.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes an atmospheric emissions management process. Based on this process, it identifies emission sources, measures emissions periodically, and quantifies emissions annually. The measurements are supported by records and evaluated annually in the management review. A control plan and a management plan with reduction and control objectives and targets have been defined.</p> <p>A summary of the air emissions and reduction plan is included in the Sustainability Report, pages 36-37: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a process for managing discharges into water. Based on this process, it identifies sources of discharge, measures the quantity and quality of discharges on a regular basis, and quantifies discharges annually. The measurements are supported by records and evaluated annually in the management review. A control plan and a management plan with reduction and control objectives and targets have been defined.</p> <p>There are no discharges of water to the ground, river or sea as all industrial wastewater is treated at an authorised wastewater treatment plant located outside the facilities.</p> <p>Discharges to Water and the reduction plan are included in the Sustainability Report 2024, pages 32-33: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes an emergency management process, covering leaks and Spills. It assesses environmental aspects annually, identifying the risks of leaks and Spills. Based on this process, it identifies risk scenarios and contingency plans that include instructions for action. It quantifies leaks and Spills annually. Spill and leak measurements are recorded and evaluated annually in the management review.</p> <p>The Entity trains its employees on the contingency plan and conducts drills to assess its effectiveness.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>Spill measurements and a Spill and leak Control Plan have been included in the Sustainability Report 2024, pages 32-33: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>The Sustainability Report states that there have been no Spills.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a Hazardous and Non-Hazardous waste management process. Based on this process, it identifies the types of waste and defines a waste management plan. It measures the quantity and type of waste on a regular basis and quantifies it annually. Measurements and movements are supported by records and evaluated annually in the management review. A control plan and a management plan with reduction and control objectives and targets have been defined, in line with the mitigation hierarchy.</p> <p>Data on Hazardous and Non-Hazardous Waste and reduction plan is included in the Sustainability Report 2024, pages 33-35: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

7. WATER STEWARDSHIP

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a water management process for both collection and use. Water collection and use sources are identified in plans. It annually assesses environmental aspects by identifying the risks and impacts of water use. Based on this process, it identifies risk scenarios and contingency plans that include instructions for action. The risk in water use has been classified as low. It quantifies water extraction and use on a monthly and annual basis. It is supported by measurements and records and is evaluated annually in the management review.</p> <p>The Entity has undertaken a water risk assessment using the Aqueduct Tool for its Area of Influence. This assessment concludes that there is no Material risk. Data on water consumption and use and the water control plan have been included in the Sustainability Report 2024, page 32: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p>
7.2a-e Water Management	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a water management process for both collection and use. It annually assesses environmental aspects, identifying the risks and impacts of water use. The risk in water use is classified as non-Material. Rainwater, groundwater and mains water consumption is monitored, and reduction targets are set. Over recent years, mains water consumption has been reduced by approximately 22 percent.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a Biodiversity management process. Ecosystems and Protected Areas have been identified, risks and potential impacts are assessed, which concluded that the risks and impacts are low.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.</p>
8.2a-g Biodiversity Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as no significant Biodiversity or Ecosystem Services related risks were identified.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Priority Ecosystem Services relevant to affected populations have been identified.</p>
8.4 Alien Species	Conformance	<p>The Entity has defined and implemented an Environmental Management System that includes a Biodiversity management process. Ecosystems and Protected Areas are identified, as well as flora and fauna species. Potential risks and impacts are assessed, concluding that risks and impacts are low within the boundaries of the Entity.</p> <p>Pampas grass has been identified as low risk, its presence and appearance on-site is monitored and, when detected, removed by the Entity's own Workers.</p>

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has defined and implemented an Environmental Management System that includes a Biodiversity management process. Ecosystems and Protected Areas are identified, as well as World Heritage Properties. Potential risks and impacts are assessed, concluding that the risks and impacts are low and that there are no World Heritage Properties within the Entity’s Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has determined through its Biodiversity management process that there is no impact on Protected Areas from the Entity’s activities.
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	Minor Non-Conformance	<p>The Entity has defined its commitment to respecting Human Rights and aligning with the United Nations Human Rights Principles in its ‘Ethics, Human Rights and Whistleblowing Policy’, its ‘Human Rights and Working Conditions Due Diligence Report’, and its ‘Supplier Code of Ethics and Conduct’. These Policies and Codes incorporate a gender perspective, and available at: https://ciclofapril.pt/pt/</p> <p>The Entity has defined a Human Rights Due Diligence process, considering the expectations and needs of Stakeholders, as well as the risks and impacts on populations in the Area of Influence. This process is based on the methodology defined by the OECD and considers the participation and opinions of Stakeholders and community members. The process is defined in the ‘Human Rights and Working Conditions Due Diligence Report’.</p> <p>At the time of the Audit, whilst this process had been initiated it was not yet completed a process with suppliers.</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	<p>The Entity has defined its commitment to gender equality and the promotion of women’s empowerment in its ‘Code of Ethics and Conduct’, ‘Ethics, Human Rights and Whistleblowing Policy’, and in its Due Diligence in ‘Human Rights and Working Conditions Due Diligence Report’ and in the ‘Supplier Code of Ethics and Conduct’. These Policies and Codes include a gender perspective, available at: https://ciclofapril.pt/pt/</p> <p>The Entity has defined actions that promote gender equality and women’s empowerment, including recruitment practices, training opportunities (awareness-raising on topics related to women’s health and well-being), career management and allocation of Management and Leadership positions to women.</p> <p>The strategy, objectives, actions and results obtained in promoting equality and supporting women are documented in the Sustainability Report 2024, pages 26-27: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.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.

CRITERION	RATING	COMMENT
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	<p>The Entity has defined its commitment to respect the interests of its community members and the efficient use of resources in its Area of Influence in its 'Code of Ethics and Conduct', 'Ethics, Human Rights and Whistleblowing Policy', 'Human Rights and Whistleblowing Policy' and 'Human Rights and Working Conditions Due Diligence Report' and in the 'Supplier Code of Ethics and Conduct'. All Policies are available at: https://ciclofapril.pt/pt/</p> <p>The Entity has implemented a risk and impact assessment process to identify the risks, impacts, and opportunities for the community in its Area of Influence. As a result of these analyses, the risks identified are low. The site visit confirmed that the risks and impacts on the community are low.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has implemented a Supplier Code of Conduct, which is available at: https://ciclofapril.pt/wp-content/uploads/2025/10/Código-de-conduta-de-Fornecedores_20251008.pdf</p> <p>The Code sets out the governance, environmental and social principles applicable to the supply chain, including respect for human rights and non-contribution to conflicts, and is communicated to suppliers. The dispatch and receipt of the Supplier Code of Conduct are monitored.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has defined a supplier assessment process based on a sustainability questionnaire, which includes risks relating to Human Rights and non-contribution to conflicts. An assessment record is maintained for raw material suppliers and service providers.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has adopted a policy of not doing business with high-risk suppliers, based on a supplier assessment process that utilises a sustainability questionnaire covering risks related to Human Rights and non-involvement in conflicts. A record is kept of the assessments undertaken on raw material suppliers and service providers. The evidence indicates that the Entity's suppliers are low risk.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established a supplier assessment process based on a sustainability questionnaire. A record is kept of the assessments undertaken on raw material suppliers and service providers. Through this process, suppliers are informed of the outcome of the Due Diligence assessment. The Entity has not however publicly disclosed any information relating to its supply chain Due Diligence assessment process.
9.9 Security practice	Conformance	<p>The Entity has defined a Human Rights Due Diligence process to identify risks, impacts and opportunities in the security service in its Area of Influence. As a result of this analysis, the risks identified are low, as there are no security personnel on site.</p> <p>The Entity has implemented technology-based surveillance systems, including video cameras and alarms, but there are no security personnel assigned to access control.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has defined a system of labour relations that allows for a collective association of Workers according to the Portuguese legislation. This commitment is defined and made public in the employee Code of Conduct and Ethics, page 17: https://ciclofapril.pt/wp-content/uploads/2024/06/CEC-PT-2.pdf</p> <p>The collective association is defined by the Workers independently and freely. The elected Workers' representatives have negotiated a Collective Bargaining Agreement with the Entity. This Collective Bargaining Agreement is negotiated at the sectoral level through the sectoral association ABIMOTA and different groups of Workers' representatives. Collective Bargaining occurs freely and without pressure from the Entity. The agreement is documented in a sectoral collective agreement.</p> <p>The sectorial Collective Bargaining Agreement is published in the bulletin of the Labour Authority: https://www.sindel.pt/acordospdf/2024-alteracao-salarial-e-outra-112.pdf</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Freedom of Association and the Right to Collective Bargaining are not restricted in the Portugal, where the Entity conducts its activities.

CRITERION	RATING	COMMENT
10.2a-c Child Labour	Conformance	<p>Portuguese law sets the minimum working age at 16 (Labour Code, Article 2, Subsection V Child Labour), but with special conditions, considering the specific risks of the work, as well as working hours.</p> <p>The Code of Ethics, the Suppliers Code, and the Ethics and Human Rights Policy and Complaints prohibit child employment, available at: https://ciclofapril.pt/pt/</p> <p>This process is guaranteed via:</p> <ol style="list-style-type: none"> 1. A copy of the identity document of all Workers at the time of hiring; and 2. Control of subcontractors' employee data in the coordination of business activities. <p>The Entity does not hire employees under the age of 18.</p>
10.3a-c Forced Labour	Conformance	<p>In Portugal, Forced Labour is strictly prohibited. The Portuguese Constitution, as well as International treaties ratified by Portugal, prohibit Slavery and Forced or compulsory Labour. Additionally, there are specific rules protecting young people against labour exploitation and ensuring fair and equitable working conditions for all Workers.</p> <p>Article 5 of the Portuguese Constitution explicitly prohibits Slavery and Forced or compulsory Labour.</p> <p>Portugal has ratified the ILO Protocol on Forced Labour, demonstrating its commitment to combating Forced Labour in all its forms, including Human Trafficking and Debt Bondage.</p> <p>The 'Ethics, Human Rights and Whistleblowing Policy' prohibits Forced Labour, page 5: https://ciclofapril.pt/wp-content/uploads/2025/11/PEDHD-PT.pdf</p> <p>The process is ensured by:</p> <ol style="list-style-type: none"> 1. A collective agreement that regulates the sanctioning regime and is in accordance with the law. 2. Communication to Workers and their representatives each time a sanction is imposed. 3. Control of subcontractors' data in the coordination of business activities. <p>The Entity has issued a Public Declaration on Modern Slavery detailing its commitment and actions to combat Modern Slavery, which is available at: https://ciclofapril.pt/pt/</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's Ethics, Human Rights, and Whistleblowing Policy prohibits Discrimination on page 5 and is available at: https://ciclofapril.pt/wp-content/uploads/2025/11/PEDHD-PT.pdf</p> <p>The strategy, objectives, actions, and results achieved in promoting equality are documented in the Sustainability Report 2024, page 26: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>Actions promoting equality and non-Discrimination among employees are implemented, including the Collective Bargaining Agreement regulating equality and non-Discrimination, a salary study comparing roles and levels, implementation of measures to facilitate work-life balance, a channel for reporting Harassment is available through the employee portal under the complaints channel and promotion criteria, validation by the team leader, and annual validation are in place. An annual evaluation is conducted for each individual and each team leader.</p>

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	<p>The Entity has defined a labour relations process that includes different committees and channels for employee engagement. The actions are defined in the Employee Motivation Plan and includes:</p> <ol style="list-style-type: none"> 1. Safety Committee 2. Work climate surveys for employees. Sent to all employees 3. Internal communications, sender management, and all recipients. 4. Employee portal to receive suggestions and, 5. Several people are tasked with visiting the production lines and collecting suggestions and proposals for improvement verbally.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has defined in its Code of Ethics and in its 'Ethics, Human Rights and Whistleblowing Policy', a commitment to the prevention of Violence and Harassment, available at: https://ciclofapril.pt/pt/</p> <p>The Entity has defined an anti-Harassment protocol, including a reporting channel, which is available at: https://ciclofapril.pt/pt/comunicacao-de-irregularidades/</p> <p>This protocol has been communicated to employees and contractors through notices on plant panels and training.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has defined a Remuneration process in accordance with Portuguese legislation and is based on the agreements defined in the sectoral collective agreement and documented in an employment contract with each employee.</p> <p>The Remuneration process is concluded with the issuance of a monthly payroll. Pay slips are computer processed and sent by email to employees. The salary paid is higher than the minimum wage in Portugal. The payment is made in Euros and in one monthly lump sum. The salary paid complies with the minimum wage in Portugal.</p>
10.8a-c Working Time	Conformance	<p>The Entity has defined a time control process in accordance with Portuguese legislation and is based on the agreements defined in the sectoral Collective Bargaining Agreement and documented in an employment contract with each employee that defines working hours, holidays and Working Time. Compliance with the legal minimum requirements is monitored for employees of recruitment agencies and contractors.</p> <p>Where possible, the Entity has defined flexible start and finish times to reconcile work and family life. The Entity has agreed calendars and timetables with employee representatives that include holiday breaks, breaks in the working day and the hours to be worked during the working day, as well as the days off each week.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has defined a labour relations system that allows for Collective Bargaining of Workers in accordance with Portuguese legislation. The sectoral Collective Bargaining Agreement is published in the bulletin of the labour authority: https://www.sindel.pt/acordospdf/2024-alteracao-salarial-e-outra-112.pdf</p> <p>Upon each recruitment, the Entity informs each employee of their rights and obligations in the on-boarding process and is documented in the employment contract.</p>

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has defined an Occupational Health and Safety (OH&S) Management System. A Health and Safety Policy has been defined and is included in the 'Code of Ethics and Conduct', 'Supplier Code of Ethics and Conduct', both available at: https://ciclofapril.pt/pt/ Risk assessments for the basis of the Management System, and are performed annually by a competent consultant. Risks are identified, including psychosocial risks, thermal stress, vibrations and noise. Where the inherent risk is elevated, an action plan is defined to eliminate or reduce the impact.</p> <p>A process for the consultation and participation of Workers is through plant onboarding, questionnaires, Human Resources meetings, and daily production meetings. A process to identify, analyse, and investigate the causes of incidents and accidents has been defined. A medical service is also available.</p> <p>The planning of OH&S-related actions and activities is not yet completed, and there are currently no internal audits undertaken of the OH&S Management System.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has implemented an OH&S Management System with defined objectives, targets, actions and Key Performance Indicators (KPIs). Control measures including follow-ups and H&S inspections are undertaken.</p> <p>The strategy, objectives, indicators, actions and results are published in the Sustainability Report 2024, pages 23-25: https://ciclofapril.pt/wp-content/uploads/2025/10/CF-ESG-Report-2024-PT.pdf</p> <p>A comparative analysis of performance with peer companies and best practices, however, is not available.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has defined a labour relations process that includes different committees and channels for OH&S engagement with employees. These include direct consultation with Workers, records of safety meetings. 'Sevens' meetings, an action plan of assessment in workstations meetings with team leaders and Workers, regular campaigns focussing on safety procedures and achievements.</p>

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	2 May 2026	Initial Certification Audit – Full Certification