

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Oetinger Aluminium

CERTIFICATE NUMBER
164

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

GUTCERT (AFNOR
GROUP)

DATE OF ISSUE
13 DECEMBER 2025

DATE OF EXPIRY
12 DECEMBER 2028

CERTIFIED SINCE
13 DECEMBER 2021

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 recycled Aluminium alloys in the form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Oetinger Aluminium
ENTITY NAME	Oetinger Aluminium
CERTIFICATION SCOPE	Production of recycled Aluminium alloys in the form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (30 September – 1 October 2021)Surveillance and Scope Change Audit (24 – 26 October 2022)Surveillance Audit (28 June 2024)Re-Certification Audit and Scope Change (15 – 16 January 2026)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">30 September – 1 October 2021 (Initial Certification Audit)24 – 26 October 2022 (Surveillance and Scope Change Audit)28 June 2024 (Surveillance Audit)15 – 16 January 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 November 2021 (Initial Certification Audit)23 March 2023 (Surveillance and Scope Change Audit)6 September 2024 (Surveillance Audit)14 February 2025 (Re-certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 September – 1 October 2021)</u></p> <p>The Audit Scope covers the production of recycled Aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance and Scope Change Audit (24 – 26 October 2022)</u></p> <p>The Audit Scope covers the production of recycled Aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.</p>

The supply chain activities included in the Audit Scope:

- Aluminium Re-melting/ Refining
- Casthouses

Criteria in the ASI Performance Standard that were identified as Non-Conformances from the Initial Certification Audit were included in the Audit Scope.

Surveillance Audit (28 June 2024)

The Audit Scope covers the production of recycled Aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.

The supply chain activities included in the Audit Scope:

- Aluminium Re-melting/ Refining
- Casthouses

Criteria in the ASI Performance Standard that were included in the Audit Scope were limited to those related to the Non-Conformances from the Initial Certification Audit.

Re-Certification Audit and Scope Change (15 – 16 January 2026)

The Audit Scope covers the production of recycled Aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

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.

CERTIFICATION PERIOD	13 December 2025 – 12 December 2028
----------------------	-------------------------------------

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

NEXT AUDIT DATE	12 December 2027
-----------------	------------------

CERTIFICATE NUMBER	164
--------------------	-----



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

Oetinger Aluminium GmbH (the 'Entity'), operates production facilities in Weißenhorn and Neu-Ulm, Bavaria, Germany. The Entity is part of the Oetinger Group and is engaged in the production of recycled Aluminium alloys for industrial applications.

The Entity's core activities include Scrap receipt and preparation, Aluminium remelting and refining, alloying, casting, and delivery of Aluminium products in liquid and solid form. The facilities produce a range of secondary Aluminium casting alloys, primarily supplied to customers in the automotive and mechanical engineering sectors. The Weißenhorn and Neu-Ulm sites operate integrated remelting and casthouse processes. Production activities include the processing of Aluminium Scrap, metallurgical treatment, quality control, and dispatch logistics. Liquid Aluminium is supplied directly to customers where applicable, and solid Aluminium is produced as ingots and other cast forms. In the last year, the Entity has produced approximately 81,841 tonnes at the Weißenhorn facility and 64,819 tonnes at the Neu-Ulm facility.

The organisation employs approximately 338 people across both sites, of whom 31 are women. Supporting functions such as quality management, environmental management, occupational health and safety, maintenance, and logistics are implemented at the site level.

The Oetinger Group acquired Aluminium Stockach in 2026, which has been integrated into AS Oxidwerke GmbH, operates under a separate management system and is not within the Certification Scope of Oetinger Aluminium GmbH.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established structured systems to ensure Compliance with applicable legal and regulatory requirements. Legal obligations are systematically identified, monitored and integrated into operational processes. Valid operating permits are maintained, and regular compliance monitoring is undertaken.
1.2 Anti-Corruption	Conformance	The Entity has established documented policies, procedures, and controls to prevent Corruption, Bribery, and extortion, in line with applicable legal requirements and the ASI Performance Standard. Anti-Corruption measures are integrated into the Entity's governance framework and supported by defined responsibilities, risk assessment processes and employee training programmes.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that addresses ethical business practices, legal compliance, Human Rights, Occupational Health and Safety, and environmental protection. The Code is supported by regular employee training and structured document review processes to ensure continued relevance and effective implementation. The Code of Conduct is publicly available on the company website: https://www.oetinger.net/wp-content/uploads/2023/09/Unternehmensleitlinie_2023.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an integrated environmental, social and governance (ESG) policy endorsed by senior management and embedded within its Management Systems. The Policies are regularly reviewed, communicated internally and publicly disclosed. The Company Policy is available at: https://www.oetinger.net/wp-content/uploads/2024/04/Unternehmenspolitik-2024-signed-1.pdf
2.2a-c Leadership	Conformance	The Entity has designated senior management responsibility through the formal appointment of an ASI Management Representative, who, together with an established system of company officers, ensures effective leadership, resource allocation and oversight of ESG and ASI requirements.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity operates a certified Environmental Management System in accordance with ISO 14001 and EMAS. Environmental aspects are systematically identified, monitored and reviewed through regular audits and management processes, supporting continuous improvement.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established social management structures and policies to support appropriate working conditions. The Entity is currently implementing improvement measures to address identified opportunities to further enhance the consistency of social infrastructure standards across operational areas.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing framework that addresses the economic, environmental, and social risk assessment of

CRITERION	RATING	COMMENT
		<p>its Aluminium supply chain. It applies a structured supplier evaluation process, including ESG risk screening, certification review and Supplier Code of Conduct requirements. The Supplier Code of Conduct is publicly available at: https://www.oetinger.net/wp-content/uploads/2024/07/Verhaltenskodex_Lieferanten_2024_DE.pdf</p> <p>Supplier risk assessments are regularly reviewed and integrated into procurement decisions. The Entity primarily sources recycled Aluminium and promotes circular material flows in line with its sustainability objectives.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or Major Changes recently. However, it has established structured processes to assess environmental and social impacts associated with New Projects and significant operational changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it has not undertaken any New Projects or Major Changes recently. However, it maintains documented procedures that address Human Rights considerations, which would apply to future projects or significant changes, as relevant.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented a site-specific Emergency Response Plan covering environmental, safety, operational and supply chain-related emergency scenarios. A documented procedure defines risk scenarios, responsibilities, reporting chains and authority notification requirements for both production sites.</p> <p>Emergency drills and simulations are conducted regularly to verify effectiveness. The Emergency Response Plan is communicated internally and is available to interested external Stakeholders upon request.</p>
2.8a-d Suspended Operations	Conformance	The Entity considers potential environmental, social and governance (ESG) impacts related to business interruption or suspension within its integrated Management Systems. Relevant risks and mitigation measures are addressed through legal compliance, contextual risk analysis and Stakeholder considerations in line with national regulatory requirements.
2.9a-b Mergers and Acquisitions	Conformance	The Entity considers environmental, social and governance aspects in relation to mergers and acquisitions through its established context and stakeholder risk assessment processes. ESG-related considerations are integrated into management reviews, ensuring oversight should future transactions occur.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity considers environmental, social and governance impacts in relation to potential closure, decommissioning or divestment activities through its established risk and Stakeholder assessment processes. These considerations are integrated into management reviews to ensure oversight and responsible decision-making.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses information on its governance and Material environmental and social impacts through both its

CRITERION	RATING	COMMENT
		Sustainability Report and the EMAS Environmental Statement. The Sustainability Report 2025 is available at: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information regarding Material fines, penalties and non-monetary sanctions in its Sustainability Report 2025, page 15: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf The Entity confirms that no monetary or non-monetary sanctions for non-Compliance with Applicable Law occurred during the reporting period.
3.3a-c Payments to Governments	Conformance	The Entity confirms that no payments were made to governments, political parties or political representatives during the reporting period. The Entity is registered in the German Transparency Register, and beneficial ownership information is formally documented. It publicly discloses information on payments in its Sustainability Report 2025, page 16: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a documented Grievance Mechanism that is available to internal and external Stakeholders. The procedure defines reporting channels, responsibilities, response timelines and safeguards against retaliation. The grievance process is operational and accessible via the whistleblower channel: https://www.oetinger.net/info-fuer-hinweisgeber/
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity conducts Life Cycle Assessments (LCA) for its Aluminium casting alloys in accordance with DIN EN ISO 14040 and ISO 14044 standards, applying 'cradle-to-gate' system boundaries. General environmental performance information is publicly available via the Entity's Environmental Statement (EMAS) and in the Sustainability Report, available at: https://www.oetinger.net/nachhaltigkeit/
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity conducts LCAs for its Aluminium casting alloys in accordance with DIN EN ISO 14040 and ISO 14044 standards, applying 'cradle-to-gate' system boundaries. See LCA: https://www.oetinger.net/wp-content/uploads/2026/02/Oekobilanzdarstellung_2022_Oetinger_Aluminium_Veroeffentlichung_PPP.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 recycles 100% of Aluminium Process Scrap generated at its facilities. Scrap materials are systematically reintegrated into production or managed within controlled recycling streams, supporting closed-loop material cycles and Circular Economy objectives.

CRITERION	RATING	COMMENT
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 actively engages with local, regional and national collection and recycling systems to support accurate measurement and continuous improvement of recycling rates for Aluminium-containing products. The company participates in established recycling networks and collaborative industry initiatives, including research and innovation projects that advance closed-loop recycling solutions for End of Life Aluminium.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity annually reports its energy consumption by source and its operational Scope 1, 2 and 3 Greenhouse Gas (GHG) emissions for its Weißenhorn and Neu-Ulm sites through its Environmental Statement (pages 11 –14). https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH-Umwelterklaerung-2025-com.pdf All disclosed information has been independently verified.
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	The Entity has established a GHG emissions reduction roadmap using the ASI methodology, aligned with the 1.5°C reduction pathway, that addresses Scope 1, 2, and 3 emissions. The roadmap includes short-, intermediate-, and long-term milestones and documents progress against its targets, using 2019 as the baseline year. The Entity is meeting its GHG emissions intensity targets.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG emissions reduction roadmap using the ASI methodology, aligned with the 1.5°C reduction pathway, that addresses Scope 1, 2, and 3 emissions. The roadmap includes short-, intermediate-, and long-term milestones and documents progress against its targets, using 2019 as the baseline year. The Entity's targets include reducing emissions by 12% to 2030 and 60% by 2035. The Entity's GHG emissions reduction roadmap is available in the Sustainability Report 2025, page 31: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf
5.4 GHG Emissions Management	Conformance	The Entity manages its GHG Emissions through a structured, independently certified Energy Management System (ISO 50001). Emissions are systematically measured, monitored and reviewed

CRITERION	RATING	COMMENT
		annually, with documented reduction measures aligned with the ASI Performance Standard and validated under EMAS.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity quantifies its Material air emissions through an independently verified Environmental Statement. Information on emissions and mitigation measures, including details on emission control improvements, is available in the Environmental Statement 2025, page 12: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf
6.2a-g Discharges to Water	Conformance	The Entity quantifies its Material Discharges to Water through an independently verified Environmental Statement. Site-specific information on water uses and wastewater discharges for Weißenhorn and Neu-Ulm is available in the Environmental Statement 2025, pages 11 and 15: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf The Entity had a freshwater leak in 2024 and corrective measures were implemented, including: closure of the leak, installation of a demand-based biocide treatment system, and reduction of water exchange and consumption.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established systems to prevent, detect and manage Spills and Leakages, protecting air, water and soil. Comprehensive risk assessments, technical containment measures, emergency procedures and regular employee training are in place. The Audit confirmed that no Spill or Leakage incidents have occurred in recent years.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity publicly discloses information on Spills and Leakages through its independently verified Environmental Statement. No Spill or Leakage incidents occurred during the reporting period, as confirmed in the Environmental Statement: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity quantifies and publicly discloses Hazardous and Non-Hazardous Waste data through its independently verified Environmental Statement 2025, pages 11 and 15–16: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity manages Aluminium Dross within a fully controlled and circular system. All Dross generated on site, as well as externally sourced Dross, is recovered and recycled, and no landfilling of Aluminium Dross or treated residues is practised. The resulting salt slag is further processed and reintroduced into material recovery

CRITERION	RATING	COMMENT
		pathways, supporting maximum resource efficiency and closed-loop Aluminium recycling. Controlled storage, sealed handling areas and defined recovery processes prevent environmental releases and support sustainable Dross management.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity annually assesses, documents and publicly discloses its water withdrawal, usage and discharge data for its Weißenhorn and Neu-Ulm sites. Water use and discharge are managed under valid regulatory permits and supported by regular laboratory testing and internal controls. Site-specific water risk assessments confirmed that no Material water-related risks were identified and the facilities are not located within water protection zones. Water balances, discharge pathways and monitoring results are transparently reported in the independently verified Environmental Statement: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf
7.2a-e Water Management	Conformance	The Entity manages water abstraction, use and discharge through structured monitoring, regulatory compliance and integration into its certified Environmental Management System. Site-specific water risk assessments confirmed that no Material water-related risks were identified within the Entity's Area of Influence. Water data, discharge information and monitoring results are reviewed annually and publicly disclosed in the Environmental Statement: https://www.oetinger.net/wp-content/uploads/2025/07/Oetinger-Aluminium-GmbH_Umwelterklaerung-2025_com.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity assesses Biodiversity-related risks and environmental impacts through its certified Environmental Management System (ISO 14001 and EMAS) and applicable regulatory permitting procedures. The sites in Weißenhorn and Neu-Ulm are located in established industrial areas. Environmental Impact Assessment screenings are conducted where legally required, including for recent infrastructure projects (e.g., the installation of a chip briquetting press in 2021). No significant impacts on Biodiversity have been identified. Further information on the environmental risk assessment is included in the Sustainability Report, page 18: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts to Biodiversity and Ecosystem Services are assessed and documented as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity-related risks within the Entity's Area of Influence have been assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity-related risks within the Entity's Area of Influence have been assessed as low.

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity has assessed its Biodiversity-related risks, including the potential introduction of Alien Species. No Material risks related to invasive or Alien Species have been identified at the sites.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity operates in established industrial areas. A review against the UNESCO World Heritage List and the German Tentative List confirms that the sites are not located in or adjacent to World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity is not operating within or adjacent to designated Protected Areas. The sites are located within established industrial areas and are not within any legally protected nature conservation areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Human Rights Due Diligence system aligned with the UN Guiding Principles on Business and Human Rights. Human Rights risks are systematically identified, assessed and managed through the Entity's risk assessment process and integrated Management System. Social risk evaluations, mitigation measures and responsibilities are documented and reviewed regularly.</p> <p>The Entity's integrated Human Rights Policy is publicly available via the sustainability section of the company website, and in the Sustainability Report: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has established policies and measures to promote gender equality and non-Discrimination, including gender-neutral recruitment practices and equality-related actions within its Social Programme.</p> <p>While a structured framework is in place, the annual reporting and documented evaluation of the effectiveness of gender equality measures have not yet been formally established.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity as no Indigenous Peoples or their lands, territories and resources are near to the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity as no Indigenous Peoples or their lands, territories and resources are near to 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.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion does not apply to the Entity as no Indigenous Peoples or their lands, territories and resources are near to the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the certification period.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the Human Rights Due Diligence conducted confirmed that there are no issues affecting Local Communities.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity operates a structured risk-based Due Diligence system for its Aluminium supply chain. The Entity predominantly processes recycled Aluminium Scrap sourced within Europe and maintains documented supplier risk assessments, declarations of origin and a publicly available Supplier Code of Conduct. No sourcing from Conflict-Affected and High-Risk Areas (CAHRAs) was identified.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity maintains a documented supplier risk assessment process, including country and ESG risk screening. No sourcing from CAHRAs was identified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented procedures to respond to identified supplier risks, including contractual requirements, origin declarations and defined escalation processes. No high-risk sourcing cases were identified during the audit period.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's supply chain Due Diligence practices are subject to periodic internal review and were audited as part of this ASI Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity conducts and publicly discloses annual supplier risk assessments, including evaluation of CAHRAs within its Sustainability Report 2025. The report includes results for 2024 and confirms that no elevated risks were identified, refer to page 14: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf
9.9 Security practice	Conformance	The Entity ensures that private security services are provided in line with recognised Human Rights standards and good practices. Security services are provided by an external provider under contractual obligations to comply with the company's Supplier Code of Conduct, which includes explicit requirements on Human Rights, labour standards, and the responsible use of security personnel.

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects Workers' rights to unite freely, seek representation, and join Works Councils without interference. The site has freely elected Worker representation and adheres to Collective Agreements negotiated with the Trade Unions.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in Germany.
10.2a-c Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker (apprentice) was 18 years of age at the time of the Audit, as confirmed by interviews and the employee roster.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Code of Conduct states that the Entity does not tolerate any form of Human Trafficking or Child Labour and is fundamentally opposed to any type of compulsory or Forced Labour. However, an annual public Modern Slavery Statement detailing actions to address modern slavery has yet to be executed.
10.4a-c Non-Discrimination	Conformance	The Entity has established policies and procedures prohibiting Discrimination in all employment-related decisions, including hiring, promotion, training, remuneration and termination, ensuring equal opportunities and prohibiting Discrimination across all employment practices.
10.5 Communication and engagement	Conformance	The Entity maintains open communication between Workers, Workers' representatives and management. Employees are represented by an elected Works Council, and regular dialogue takes place on workplace-related matters. The Audit confirmed that Workers can raise concerns without fear of retaliation.
10.6a-g Violence and Harassment	Minor Non-Conformance	The Entity promotes a respectful working environment and prohibits Violence, Harassment and any form of degrading treatment. Policies addressing workplace conduct are communicated to employees, and interviews confirmed that reporting channels are available and functioning. The Entity has not publicly disclosed a Policy on Violence and Harassment.
10.7a-c Remuneration	Conformance	The Entity remunerates its Workers in accordance with the applicable Collective Bargaining Agreement (IG Metall Bavaria). The lowest pay grade (EG 3, entry level) is above the German statutory minimum wage. Employment contracts clearly describe terms and conditions of employment and remuneration and are provided in a comprehensible language and format. Wage levels and adjustments are aligned with Collective Bargaining Agreements and coordinated with the Works Council.
10.8a-c Working Time	Conformance	The Entity complies with relevant Applicable Law and the Collective Bargaining Agreements regarding working time, public holidays and annual leave. The provisions in place ensure that Workers have time

CRITERION	RATING	COMMENT
		off and the length of workdays is compliant with Applicable Law, industry standards, and the requirements of this Criterion.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that Workers are informed of their rights through publicly displayed legal notices, internal communication channels and active engagement of the Works Council. Interviews during the Audit confirmed that employees are aware of their Labour Rights and the related policies.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&S) Management System that is applicable to all Workers and visitors. The system includes regular risk assessments, documented safety trainings, occupational medical surveillance, quarterly Safety Committee meetings and systematic incident tracking.</p> <p>The OH&S performance and accident statistics are reviewed annually and documented in the company's Occupational Safety Report. Continuous improvement measures are implemented to further strengthen workplace safety at both sites.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity operates an OH&S Management System compatible with ISO 45001 and publicly discloses accident statistics in its Sustainability Report 2025, page 13: https://www.oetinger.net/wp-content/uploads/2026/01/Nachhaltigkeitsbericht_2025_OECZ_j.pdf</p> <p>Safety performance is monitored internally through leading and lagging indicators and reviewed in regular management meetings. The leading indicators are not clearly structured and presented however, nor is a comparative analysis against industry benchmarks or peer performance presented.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity actively involves employees in Occupational Health and Safety through structured participation mechanisms, including Occupational Safety Committee meetings, risk assessments and a documented health management program with defined objectives and measurable indicators.

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	12 November 2021	Initial Certification Audit – Provisional Certification
1	12 May 2023	Surveillance and Scope Change Audit – Full Certification, ‘Material Conversion (Product and Transformation)’ removed from Supply Chain Activities’
2	24 September 2024	Surveillance Audit
3	15 May 2026	Re-Certification Audit and Scope Change – Full Certification Correction to Criterion 8.4a (PS V2) in Rev 2 to reflect non-applicability of the Criterion due to the Certification Scope
