

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Aludium France SAS

CERTIFICATE NUMBER
275

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
18 APRIL 2026

DATE OF EXPIRY
17 APRIL 2029

CERTIFIED SINCE
18 APRIL 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@Aluminium-stewardship.org

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

CERTIFICATION SCOPE

Production of Aluminium coils in a
cold rolling mill including semi-
fabrication at Aludium
Castelsarrasin plant, France.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Aludium Premium Aluminium
ENTITY NAME	Aludium France SAS
CERTIFICATION SCOPE	Production of Aluminium coils in a cold rolling mill including semi-fabrication at Aludium Castelsarrasin plant, France.
SUPPLY CHAIN ACTIVITIES	Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (13 – 15 September 2022) - Surveillance Audit (29 – 31 July 2024) - Re-Certification Audit and Scope Change (31 March – 2 April 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	13 – 15 September 2022 (Initial Certification Audit) 29 – 31 July 2024 (Surveillance Audit) 31 March – 2 April 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	15 March 2023 (Initial Certification Audit) 11 October 2024 (Surveillance Audit) 6 July 2026 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (13 – 15 September 2022)</u> The Audit Scope covers the Aludium Castelsarrasin plant (France), including semi-fabrication (Production of coils in cold rolling mill). Supply chain activities included in the Audit Scope: - Semi-Fabrication All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (29 – 31 July 2024)</u> The Audit Scope included the Aludium France plant in Castelsarrasin, France. Supply chain activities included in the Audit Scope: - Semi-Fabrication Criteria in the ASI Performance Standard that were identified as non-conformities from the previous Audit and those considered higher risk for the Facility were included in the Audit Scope. The Audit was undertaken as a 'desktop' exercise consistent with the Entity's overall maturity level and the audit type. Stakeholders, including Workers were not interviewed during the Audit as the Criteria included in the Audit Scope were mainly reporting-related and did not require Stakeholder input.

Re-Certification Audit and Scope Change (31 March – 2 April 2026)

The Audit Scope covers the production of Aluminium coils in a cold rolling mill including semi-fabrication at Aludium Castelsarrasin plant, France.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

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

18 April 2026 – 17 April 2029

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

18 April 2027

CERTIFICATE NUMBER

275



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

With over 60 years of experience, Aludium is considered a leading manufacturer of Aluminium products. It uses a specialised production process to create high-quality Aluminium sheets and coils. The company, which has over 850 employees. Its products are distributed to customers worldwide in the architectural, energy, insulation, equipment, packaging, and transportation sectors. Aludium currently produces up to 250,000 tonnes of alloys per annum at its three plants in Alicante and Amorebieta (Spain) and Castelsarrasin (France) (the 'Entity'). It also has a Research and Development (R&D) located in Cindal (Alicante, Spain).

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has multiple systems in place to maintain awareness of and ensure compliance with Applicable Law, including Company Rules (Règlement Intérieur), validated by the Trade Union of the Employers of the Metal Industry, 'Union des industries et métiers de la métallurgie' (UIMM), a legal advisor, training sessions, an elected employee representatives' committee (Comité Economique et Social (CSE)). The Group's Code of Conduct, circulated to all Stakeholders and displayed on information panels for employees, which also reiterates that all entities of the Group must adhere to local and international regulations.
1.2 Anti-Corruption	Conformance	The Entity's Code of Conduct states a commitment to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Selected employees identified as being more exposed to this risk receive training on these topics.
1.3a-e Code of Conduct	Conformance	The Entity adopts the Group-level Code of Conduct which has been developed in consultation with international standards and includes principles relevant to Environmental, Social and Governance (ESG) performance. The Code is provided to all new employees upon hiring. The Code is reviewed upon any changes to the Business that alter Material ESG risk(s), and/or on any indication of a control gap. The Code is available at: https://aludium.com/wp-content/uploads/2024/12/Code-of-Conduct.pdf.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	At Group level, the Code of Conduct is available at: https://aludium.com/wp-content/uploads/2024/12/Code-of-Conduct.pdf The Entity has developed and implemented an integrated Sustainability Policy, signed by the Sustainability manager and the Plant Director, which integrates the practices outlined in the ASI Performance Standard. The Policy is reviewed upon any changes to the Business that alter Material ESG risk(s), and on any indication of a control gap. The Entity has established multiple communication channels for its Policies. It has an elected employee representatives' committee (CSE) where both employees and management are represented.
2.2a-c Leadership	Conformance	The Plant Director is nominated as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity monitors and reviews its strategic environmental indicators in the monthly management meetings and reports them in the CODIR (Comité de Direction) presentation (management committee or executive committee) for discussion with the management team. The site holds ISO 14001 and ISO 50001 Certifications, valid until 2028.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity manages its social aspects in multiple ways, such as applying the Code of Conduct referencing internationally recognised Labour and Human Rights principles and, the presence of an elected employees' representatives' committee (Comité Socio-Economique) that meet six times a year to ensure continuous and constructive dialogue on social risks. In addition, the Entity has completed an ISO26000 assessment (International guidance standard on social responsibility) in January 2026 where no major risks were identified. The Entity has undertaken Due Diligence on its operations and supply chain first through the work required to maintain its Global Compact membership. The Entity has submitted its first submission in 2025-2026 of its Communication on Progress (CoP), the main reporting mechanism of the UN Global Compact.
2.4a-e Responsible Sourcing	Conformance	The Entity requires its suppliers to sign standard Terms and Conditions which contain expectations on Business Ethics, Human Rights, the Environment and Health and Safety. A supplier evaluation questionnaire contains all sustainability aspects outlined in the Terms and Conditions. Metal purchasing is managed at Group level by Head Office in Spain and is ASI Certified. Strategic suppliers at site level are those critical to the continuity of the business: laminating oil, chemical products, and packaging supplies. Suppliers complete an ESG questionnaire and may be audited by the Entity subject to the level of risk. The Entity reviews its Responsible Sourcing Policy upon any changes to the Business that alter Material ESG risk(s), and on any indication of a control gap. The Responsible Sourcing Policy is available at: https://aludium.com/en/aludium The Entity's General Purchase Conditions also include ESG clauses and suppliers must sign the 'ANNEX II – Supplier standards', page 12: https://aludium.com/wp-content/uploads/2024/10/ALUDIUM-General-Terms-and-Conditions_English-v4.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities in the last five years. In the event of Major Changes to the site, the Entity would commission a specialist consultancy to undertake an Impact Assessment. The Entity has developed a CAPEX procedure for such events.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes to existing Facilities in the last five years. In the event of Major Changes to the site, the Entity would commission a specialist consultancy to undertake an Impact Assessment. The Entity has developed a CAPEX procedure for such events.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan. Drills include the participation of local fire-fighters. Employees are trained and the plan is regularly tested, in accordance with legal requirements. The Entity holds valid ISO 45001 certification, which incorporates a review of the emergency plan and management plan at least every three years, after any changes that alter the nature or scale of emergency incident risks, or on any indication of a control gap.

CRITERION	RATING	COMMENT
		The Entity provides its emergency response plan available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity's Business Resilience Plan considers events including strikes and pandemics with focused actions on business continuity. The Entity reviews its Business resilience plan at least prior to every ISO re-certification audit, after any changes to the Business that alter the nature or scale of environmental, social, and governance risks, or on any indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Group-level Mergers and Acquisitions Policy is used to review ESG issues as part of the Due Diligence process, which is based on the Organisation for Economic Co-operation and Development's (OECD) principles.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has not commenced any closure, decommissioning, or divestment since its inception. Should such an event occur in future, the Entity would commission a specialist consultant historically used by the site for this type of project.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social, and economic targets and impacts in its Sustainability Report 2024 (Governance chapter), pages 6-9: https://aludium.com/en/sustainability-reports/
3.2 Non-compliance and Liabilities	Conformance	The Entity has not received any significant fines, judgments, penalties, or non-monetary sanctions for non-compliance over the last year. Should this occur in future however, the Entity will publicly disclose the information in the Group-level annual Sustainability Report, available at: https://aludium.com/en/sustainability-reports/
3.3a-c Payments to Governments	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. The Entity performs independent external regulatory audits, which are verified by accredited agencies. The audited financial accounts of the Entity and the assurance report prepared by PwC are available at: https://www.pappers.fr/entreprise/aludium-france-410125439/comptes/ALUDIUM%20FRANCE%20-%20Comptes%20sociaux%202024%2018-09-2025.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity implements a 'whistleblowing' system which is adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. The confidential complaint form is available at: https://aludium.com/en/aludium-information-channel
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) using a tool developed by ADEME (France's Agency for Environmental Transition). The LCA is based on ISO 14040 and ISO 14044 Standards. Assumptions

CRITERION	RATING	COMMENT
		and limitations are included, and the evaluation of impacts addresses a 'cradle-to-gate' approach.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has implemented a procedure for the communication of the LCA Report to customers or Stakeholders upon request. At the time of the Audit, neither clients nor Stakeholders have yet requested the LCA. Assumptions and limitations are included, and the evaluation of impacts addresses a 'cradle-to-gate' approach. The Entity has published information on its AludiumEco product in the Sustainability Report 2024, on pages 7, 8, 9, 24 and 25: https://aludium.com/memorias-de-sostenibilidad/
4.2 Product Design	Conformance	The Entity's activities include laminating and cutting and therefore this is a supply chain segment does not have control over the design of the 'end product' or its chemical composition. The Entity does however integrate clear objectives in its production to optimise the manufacturing process and minimise Scrap. The Scrap produced is entirely reused in another plant within the Group.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established systems to minimise the generation of Aluminium Process Scrap and already recovers 100% of its Scrap through the collection and segregation of alloys for easier recovery and sending it back to other plants of the same Group. The Entity has a clear, practical system for separating Aluminium alloys and grades by chemical composition for recycling. The Entity uses colour-coded tape on alloys and matching bins to sort Scrap for recovery. A clear, practical manual has also been developed for operators.
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 has implemented the Group's recycling strategy, where it sends all Scrap to two Spanish sites within the same Group for reuse. At these facilities, the Scrap is a critical input into the production process therefore the Entity must measure and forecast Scrap quantities sent to each plant. The Entity is engaged in international initiatives at the Group level to promote the recycling of 'end-of-life' products, such as AluFoil (formerly the European Aluminium Foil Association - EAFA). The Entity is part of AluFoil (formerly EAFA). The recycling strategy is disclosed in the Sustainability Report 2024, pages 22-24: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/ The Entity reviews its recycling strategy at least once every five years, during ISO recertification.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity monitors its energy sources per source and reduces its consumption 'year on year' with progress reviewed at monthly management reviews (CODIR). The Entity has also achieved ISO 50001

CRITERION	RATING	COMMENT
		Standard certification and has developed procedures to monitor Greenhouse Gas (GHG) emissions and energy consumption by energy source. GHG emissions calculations, verification, and disclosure are managed at the Group level. The Entity calculates GHG emissions on an annual basis and for Scopes 1, 2, and 3. The site's 2024 GHG emissions report was reviewed and was verified by a specialist company, which issued a verification report. The Group publishes annual GHG emissions and energy consumption data by source in the Sustainability Report 2024, pages 27–28, and 36: https://aludium.com/memorias-de-sostenibilidad The management review of the Energy Management System includes the monitoring of energy use and consumption in 2024.
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 uses a method for calculating GHG emissions and setting reduction targets based on the GHG Protocol, ISO 14064 Standard, and the ASI Performance Standard, including the use of the GHG Pathways Calculation Tool. It has also validated its calculation method based on ISO 14067:2019. The Entity has demonstrated its alignment with the 1.5°C global warming scenario and its strategy is aligned with ASI requirements. In 2024, the Group's carbon footprint was 5.17 t CO₂/t Al from production to marketing, a reduction of 3.27 t CO₂/t Al from production to marketing compared to the baseline year (2018). The key factor in this reduction in the carbon footprint is the decrease in indirect emissions generated by the production of Primary Aluminium. The pathway for planned reductions over the years is presented in the Sustainability Report 2024, pages 27–28: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/
5.3b–e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has published its GHG Emissions Reduction Pathway, annual targets, actions and results in its Sustainability Report 2024, pages 27–28: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/ The Entity has set a GHG reduction target for 2025: ≤4. t CO₂eq/t Al. It has also set a GHG reduction target for 2030: ≤3t CO₂eq/t Al. Actions at the Group level support this objective are to continue to increase the production of Recycled Aluminium, using 'low-carbon' Primary Aluminium when necessary for technical reasons. From January 2025, 100% of the electricity used s derived from renewable sources.

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5.4 GHG Emissions Management	Conformance	All sites within the Group have implemented ISO 14001 and ISO 50001 management systems with procedures for establishing objectives and actions regarding GHG emissions. The Head Office has set up a Sustainability Committee led by the CEO and comprising the company's various directors (Sales, HR, R&D, and Supply Chain). This committee monitors GHG emissions on a quarterly basis and establishes action plans in the event of deviations from the annual plan and/or sets out lines of action for the following year. The site has implemented measures that will contribute to reducing GHG emissions through energy consumption reduction measures, minimising Waste of Aluminium material during production, and better sorting of Aluminium scrap for recycling. The GHG emissions reduction target and roadmap are set at the group level, and there is a single plan for the whole company. The main measures that will allow reaching the target are reducing the sourcing of raw Aluminium slabs and increasing the amount of recycled material used at the cathouses of the group.

6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Minor Non-Conformance	The Entity quantifies and reports its Emissions to Air through a declaration to local authorities on dedicated platform 'Gestion électronique du registre des émissions polluantes' (GEREP). The Entity's compliance with local law is regularly inspected by external company Apave. a recent report has shown no emissions above the thresholds defined in its Prefectural decree/Industrial permit (Arrêté Préfectoral). The Entity also implements plans to minimise the adverse impacts of its emissions. One initiative included the installation of a biofilter to remove the lamination oil from air emissions, which has allowed significant reduction of emissions and the use of more environmentally performant materials. The Entity reviews its Environmental Management Plans prior to ISO 14001 and ISO 50001 Standards re-certification. The plan would also be reviewed in case of any changes to the Business that would alter Material risks, and on any indication of a control gap. A summary of air emissions is disclosed in the Sustainability Report 2024, page 35: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en The Entity has not however publicly disclosed a description of the management plans implemented to address its air emissions-related risks and impacts.
6.2a-g Discharges to Water	Conformance	The Entity quantifies and reports annually its weekly Discharges to Water on a dedicated governmental platform (GEREP). The Entity operates its own water filtration station to neutralise production water before discharging it in the local water stream. The Entity applies the thresholds defined in its industrial permit (Arrêté Préfectoral) and follows strict rules regarding the quality of the production water before discharge. Water is sampled daily and water indicators have been established. The Entity's water consumption and water discharge are non-Material due to the nature of the activity (laminating), as a result the disclosure of the management plan is not required.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has identified its main risk of Leakage or Spill and the behaviours that might lead to it. The Entity undertakes exercises on chemical prevention to minimise risk. The site reviews its Environmental Management Plans prior to every ISO 14001 and ISO 50001 Standard. The plan is also be reviewed in case of any changes to the Business that would alter Material risks, and on any indication of a control gap. There have not been Material Spills or Leakages in recent years.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	In case of emergency, the Entity will adhere to its emergency plan and immediately make a declaration to the regional authority for environmental and urbanism management (Directions Régionale de l'Environnement, de l'Aménagement et du Logement (DREAL)) and other affected parties as per legal requirements. These steps are listed in the Spill management procedure and the emergency preparation procedure. In recent years, the Entity has not had a Material Spill or Leakage.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. It has assessed the Material impacts on human well-being and the environment. As per legal requirements, the Entity records in its Waste Register the quantity of Waste by type, disposal method, and selected Waste-treatment company (Registre des déchets). The quantities of Waste reported are categorised as either hazardous or non-hazardous, with a target to reduce 'year on year'. Progress is discussed at monthly management reviews (CODIR). Waste quantities are disclosed in the Sustainability Report 2024, page 34: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. It uses both municipal water and river water, and applies the thresholds defined in its Prefectural decree. Consumption is monitored daily, weekly, and monthly, and reviewed by senior management during the CODIR meeting. Water withdrawal and use by source and type are disclosed annually basis. Refer to the Sustainability Report 2024, page 35: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/ The Entity has used the World Resources Institute (WRI) Aqueduct Tool to assess its water risk, and the risk remains unchanged as 'medium' in

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		2026. Main risks for this region include water stress, water depletion, and groundwater table decline. The Entity does not however disclose any information regarding its plans to manage its risks and impacts linked to water use, nor time-bound, contextual targets that address the risks identified.
7.2a-e Water Management	Minor Non-Conformance	The Entity has implemented long-term water management plans. Measures include some minor projects such as the ongoing reduction of leaks, installing a meter on the stripping machine, and the reuse of water discharged from the stripping machine. Water indicators are monitored by the Environmental team and during Management Reviews. The Entity reports its water consumption through a declaration to local authorities on a dedicated platform (GEREP). The Entity does not however disclose any information regarding its plans to manage its risks and impacts linked to water use.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has undertaken a Biodiversity assessment to evaluate the risk and Materiality of the impacts from the land use and activities in its Area of Influence. The assessment concludes that the Entity has very low to no negative impact on Biodiversity. This study concluded that the site has a positive impact, due its natural buffer zone on the perimeter of the site, where a variety of open, semi-open and wooded areas provide suitable habitat for multiple species of European birds, invertebrates, and other wildlife, and has been found to constitute a Biodiversity enhancement.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as it has determined that the risk to and impacts on Biodiversity and Ecosystem Services are very low to no negative impact. The Entity has however developed an action plan to implement further improvements through late-season grass cutting, managing the wooded area more closely, planning to monitor the potential arrival of exotic species, educating the workforce on Biodiversity and installing beehives.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as it does not depend on Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity's main risk of introducing Alien Species is via the use of wooden pallets for receiving and shipping goods, even though the Biodiversity risk assessment has stated the risk was low to non-existent. To manage this potential risk, the Entity respects the legal requirements to purchase pallets treated with chemicals to prevent parasites; besides, when the Entity sends pallets outside the EU, it is a

CRITERION	RATING	COMMENT
		legal requirement that the pallets be labelled 'ILPI5'. The Entity purchases pallets made up of locally grown and processed wood, as per the requirements of its Responsible Sourcing Policy. The site has considered the recommendations of the Biodiversity assessment and made formal plans to continuously monitor the potential introduction of exotic species in its Area of Influence.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity does not have any expansion plans, and it does not conduct any mining activity. The nearest UNESCO World Heritage property is the Canal du Midi, which runs through the town of Castelsarrasin and is therefore not located near the Entity. The Entity has assessed its potential interactions with this heritage property through the Biodiversity study, regulatory Environmental Impact Assessments and Stakeholder engagement with local authorities and communities. As a result, no adverse impacts on its integrity are identified.
8.6a-d Protected Areas	Conformance	The industrial perimeter of the site is not directly located within or in contact with a Natura 2000 Protected Area. The nearest designated site, the Vallée de la Garonne de Muret à Moissac, is located in proximity along the Garonne corridor, at an estimated distance of approximately one kilometre from the Entity's boundary.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has undertaken Due Diligence on its operations and supply chain first through the work required to maintain its Global Compact membership; it has achieved the first submission of its Communication on Progress (CoP) in 2025-2026. At a Group level, the Code of Conduct states the company's commitment to respecting Human Rights and a Human Rights Compliance Validation Procedure based on the United Nations Guiding Principles on Business and Human Rights. Refer to: https://aludium.com/wp-content/uploads/2024/12/Code-of-Conduct.pdf The Entity implements a Human Rights Compliance Validation Procedure, aiming to detect the risks associated with Human Rights violations caused by its direct and indirect activities. The procedure was designed based on the Human Rights Compliance Assessment (HRCA) methodology created by the Danish Council on Human Rights. As per the procedure, any issues raised must be communicated to the designated Aludium Compliance Officer, with the help of a legal counsellor, who will initiate an investigation. The Entity's Compliance Officer may also undertake audits on site. The results of the investigation are brought to the attention of the Sustainability Council and reported to the Board in an annual memo. A corrective action and remediation plan must be drafted by the Compliance Officer in collaboration with the affected parties and implemented.

CRITERION	RATING	COMMENT
		The Entity has been assessed as having a very low risk of causing or contributing to actual adverse impacts. Its main risk of potential negative Human Rights impact would be indirect, related to Primary Aluminium sourcing. This is however mitigated by the fact that the entities that the Entity purchases from are Certified to the ASI Performance and Chain of Custody Standards and that all their suppliers have been subjected to Due Diligence as part of this process. The site has also undergone a first ISO 26000 Standard assessment in January 2026, which did not raise any new risk. If the Entity, ever identified as having caused or contributed to adverse Human Rights impact, it will follow the investigation and remediation procedure described in the Group's Compliance Procedure.
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	An agreement and an action plan regarding Gender Equity are in place at the Entity, and the site discloses its Professional Equality Index on the Government website as per legal requirements, at: https://egapro.travail.gouv.fr/index-egapro/recherche?query=aludium The index is reviewed annually as per legal requirements, and the plan would also be reviewed in case of any changes to the Business that would alter Material gender risks, and on any indication of a control gap. At Group level, the Code of Conduct explicitly states the Group's commitment to uphold women's rights. A Women's Committee has also been created recently at Group level. It has two aims, to create a space for open discussion between women working at the Entity and to promote the attractiveness of industrial jobs for women. In the Sustainability Report (pages 10-11), numerous examples of initiatives are described, promoting women's empowerment in the workplace. A comprehensive, and ambitious Equality Plan has been implemented. Refer to: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/ The Entity has not however disclosed the effectiveness of its measures and initiatives. Whilst the data pages within the Sustainability Report (page 32) include useful figures on the number of men and women employed at various managerial levels, they do not include historical figures, which prevents 'year-on-year' comparison.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	The site is in an established industrial area of southern France. No cultural or sacred heritage sites have been identified within the Entity's Area of Influence. This conclusion is supported by multiple sources of evidence, including regulatory Environmental Impact Assessments conducted under the ICPE permitting framework, which require identification of protected cultural and heritage sites, as well as Stakeholder engagement with local authorities and communities.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage sites within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since joining ASI.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	In its stakeholder engagement procedure, the Entity maps its local Stakeholders and recognises its responsibility to contribute positively to the development of the communities in which it operates and where it has commercial interests, as well as to minimise any potential adverse impact. This is reiterated in the Code of Conduct under Section 7, refer to: https://aludium.com/wp-content/uploads/2024/12/Code-of-Conduct.pdf External Stakeholder interviews during the Audit confirmed the positive relationship of the Entity with neighbouring communities. The site's Stakeholder list however is incomplete, and the types of impacts and mitigation actions have not been defined yet. This will also need to be completed in consultation with Stakeholders. The plan is also not disclosed, and whilst the Group discloses some initiatives with local populations (sports, education) in the Sustainability Report, it does not describe how it manages its impacts on other types of Stakeholders.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has implemented a Responsible Supply Chain Management Policy and Supplier Code of Conduct that are aligned with the United Nations Global Compact. The Entity expects all contracted suppliers to sign the Supplier Code of Conduct and to respect and adhere to its terms on the environment, society, business ethics, Human Rights, and labour practices. The Entity's potential impact has been assessed as part of a Group-wide Human Rights Due Diligence assessment which has a very low risk of contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity indirectly sources Primary Aluminium in its supply chain as its supplier of semi-fabricated Aluminium coils sources Primary Aluminium. This represents approximately 23% of inputs in the Group's supply chain, with the reminder as Recycled Aluminium. For Primary Aluminium, the Group's strategy in order to mitigate Conflict-Affected and High-Risk Areas (CAHRAs) risks is to purchase only from smelters that are ASI Certified. The Entity considers ASI Certification as the assurance for the responsible production, sourcing, and stewardship of Aluminium, including adequate CAHRAs Due Diligence.

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		This confirms that the Entity has fulfilled Due Diligence requirements expected at its level, having used best efforts to identify the Aluminium smelters present in its supply chain indirectly, and having sought to verify that the smelters have conducted Due Diligence in accordance with the OECD Guidance.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The strategy of procuring only ASI Certified Aluminium is considered sufficient to mitigate risks related to in the Entity's supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The ASI Audit is an independent third-party assessment of the Entity's Due Diligence practices, and as such satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Entity does not report annually on supply chain Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).
9.9 Security practice	Conformance	The Entity does not engage the use of any public and private security providers on site.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects its Workers' Freedom of Association and right to Collective Bargaining. Representatives from major Trade Unions are active on site. The Entity also has an elected employee representatives' committee mixing workers and management (the Comité Social et Economique (CSE)).
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 Entity as it is not located in a country where the right to Freedom of Association and Collective Bargaining is restricted.
10.2a Child Labour	Conformance	The Entity does not use nor support the use of Child Labour in any form. The hiring procedure implemented by the Human Resources department guarantees that the mandatory documents for verifying the right to work and legal age to work is assessed. This is supported by the Entity's Human Rights Policy based on internationally recognised principles, including the International Labour Organisation (ILO) Conventions C138 and C182.
10.3a-c Forced Labour	Conformance	The Entity does not engage in nor support the use of Forced Labour in any form. The hiring procedure and Company Rules (Règlement Intérieur) prevent this, as well as the Human Rights Policy which is based on internationally recognised principles (the UN Guiding Principles for Business and Human Rights and ILO Conventions). The rights and duties of Workers are written in the Règlement Intérieur (Company Rules) and there is an overall sound awareness of the rules on site. This was also confirmed during the Audit through interviews of various types of Workers and of a representative from an external service

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		provider intervening on-site as part of the external Stakeholder interview process. The Entity has two people in charge of Human Resources who prepare the employment contracts and gather the mandatory documents to verify right-to-work aspects. The Entity publicly discloses an annual Modern Slavery Statement at the Group level, detailing their actions to address Modern Slavery: https://aludium.com/wp-content/uploads/2025/12/ALU-010-MODERN-SLAVERY-POLICY.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has procedures in place to ensure equal opportunities and prevent Discrimination. The mandatory display panels on-site display to staff the related texts of law as per legal requirement, the French Penal Code, outlining the legal framework prohibiting and sanctioning all forms of Discrimination, sexual and moral Harassment, and equality of pay between men and women. The hiring procedure prohibits and prevents Discrimination, supported by the Human Rights Policy based on internationally recognized principles (the United Nations Guiding Principles for Business and Human Rights and ILO Conventions). This was confirmed by interviews of Workers and of a representative from the local employment agency.
10.5 Communication and engagement	Conformance	The Entity has established multiple communication channels between Workers and management, including an elected employee representatives' committee (CSE), short standing meetings (causeries), training sessions, Human Resources office's 'drop-in' sessions, and for confidential reporting, the 'whistleblowing' line, and the anti-Harassment representative.
10.6a-g Violence and Harassment	Conformance	Anti-Violence and Harassment principles are included in the Code of Conduct, which is reviewed when there are any changes to the Business that would alter Material risks, and on any indication of a control gap. Refer to: https://aludium.com/wp-content/uploads/2024/12/Code-of-Conduct.pdf The Entity has implemented and tested in 2025 a mediation process for inter-personal conflict situations, as well as a Moral Contract document requiring Workers to commit to working with people of all personality traits. The Entity is also building an internal guidance document for new managers on People Management, including guidance on Non-Violent Communication. Mandatory display of workplace information (Affichage obligatoire) includes the disciplinary rules and scale of sanctions, as part of the Company Rules (Règlement Intérieur). This states that the Entity does not engage in nor tolerate the use of corporal punishment; mental or physical coercion; Harassment, and gender-based Violence, including sexual Harassment, or verbal abuse of Workers. The disciplinary investigation procedure and records are maintained by the Human Resources Manager, examples were reviewed during the Audit where a Worker went through every stage of sanctions from initial verbal warning to dismissal. Employee interviews confirmed awareness of this process. The Entity has nominated an anti-Harassment representative amongst the employees, as per legal requirements, and has

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		specifically selected a female employee to ensure they are approachable for female Workers. Psycho-Social Risks (RPS) are considered in the occupational risk register (Document Unique d'Evaluation des Risques), and risk mitigation measures are in place; this is reviewed annually as per legal requirements.
10.7a-d Remuneration	Conformance	The Entity pays Workers a living wage above the legal minimum, and the levels are listed in the Collective Bargaining agreement. Any deductions are in line with legal requirements. Overtime is compensated at a premium. Various bonuses and compensations are granted to Workers. Wages and benefits are paid monthly, as verified on payslips, in the paid software, and via Worker interviews. A payslip calendar is displayed for Workers in the break room.
10.8a-c Working Time	Conformance	Working hours comply with national laws and with the Collective Bargaining agreement of the local Metal sector, Convention Collective de la Métallurgie Midi-Pyrénées. Whenever there is work above the legal limit of thirty-five hours per week, Workers are given rest days as compensation. Overtime hours are voluntary, as is confirmed in employees' files, payslips, and interviews.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through various mechanisms, including employment contracts, initial training upon hiring, meeting minutes from the Worker representatives' body (CSE), and display of Policies and procedures in common areas.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a Policy covering Quality, Health, Safety and Energy, signed by the Director. The Policy applies to everyone present in any area or activities under the Entity's control. The Entity also holds ISO45001 certification and has no open major non-conformances in the latest audit report. The certificate is valid until March 2027. The site's Health and Safety risk assessment (Document Unique d'Evaluation des Risques - DUER) is aligned with legal requirements. To evaluate performance, the QHSE technician also undertakes monthly factory walkovers. Regarding training, initial induction on Health and Safety is provided upon commencement of work for all new recruits, then refreshed annually, and includes psychosocial risks.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity reviews its OH&S Management System prior to every ISO 45001 Standard audit. It would also be reviewed in case of any changes to the Business that would alter Material gender risks, and on any indication of a control gap. Health and Safety performance is presented in the Management Review. For benchmarking, the Entity assesses its Health and Safety performance against other companies of the relevant category of

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		industry (metal laminating and associated activities) on government website LegiFrance (www.legifrance.gouv.fr). Although the Aludium Group publishes its Health and Safety strategy in its Sustainability report with leading and lagging indicators (page 15), it does not however report on the effectiveness of the OH&S Management System, including a comparative performance analysis with peer companies and best practices. Refer to: https://aludium.com/3d-flip-book/memoria-sostenibilidad-2024-es-en/
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established multiple communication channels on Health and Safety topics: an elected employee representatives' committee (CSE); short standing meetings (causeries); training sessions; 'drop-in' sessions in the Human Resources office, and for confidential reporting, a 'whistleblower' hotline with a guarantee of protection of the identity of the 'whistleblower'.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 April 2023	Initial Certification Audit – Full Certification
1	29 October 2024	Surveillance Audit
2	24 July 2026	Re-Certification Audit and Scope Change to apply V3.1 of the ASI Performance Standard