

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

EGA Leichtmetall GmbH

CERTIFICATE NUMBER
251

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
DQS CFS

DATE OF ISSUE
28 JUNE 2026

DATE OF EXPIRY
27 JUNE 2029

CERTIFIED SINCE
19 JANUARY 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production and sales of continuous
cast Aluminium wrought alloys in
various formats at EGA Leichtmetall
GmbH located in Hannover,
Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	EGA Leichtmetall GmbH
ENTITY NAME	EGA Leichtmetall GmbH
CERTIFICATION SCOPE	Production and sales of continuous cast Aluminium wrought alloys in various formats at EGA Leichtmetall GmbH located in Hannover, Germany.
SUPPLY CHAIN ACTIVITIES	- Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (7 – 8 November 2022) - Surveillance Audit (16 May 2023) - Surveillance Audit (23 September 2024) - Re-Certification Audit and Scope Change (21 April 2026)
AUDIT FIRM	DQS CFS
AUDIT DATE	7 – 8 November 2022 (Initial Certification Audit) 16 May 2023 (Surveillance Audit) 23 September 2024 (Surveillance Audit) 21 April 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	22 December 2022 (Initial Certification Audit) 8 June 2023 (Surveillance Audit) 16 November 2024 (Surveillance Audit) 12 June 2026 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (7 – 8 November 2022)</u> The Audit Scope includes production facilities of continuous cast Aluminium wrought alloys at Leichtmetall's Aluminium Giesserei facility located in Hannover, Germany. The Supply Chain Activities included in the audit scope: - Aluminium Re-melting/Refining - Casthouses - Semi-Fabrication All relevant criteria in the ASI Performance Standard were included in the audit scope. <u>Surveillance Audit (16 May 2023)</u>

The Audit Scope includes production facilities of continuous cast Aluminium wrought alloys at Leichtmetall's Aluminium Giesserei facility located in Hannover, Germany.

The Supply Chain Activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

Criteria in the ASI Performance Standard relevant to the on-site component necessary to transition to Full Certification following the previous audit were included in the audit scope.

Surveillance Audit (23 September 2024)

The Audit Scope includes production facilities of continuous cast Aluminium wrought alloys at EGA Leichtmetall GmbH facility located in Hannover, Germany.

The Supply Chain Activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

Criteria that were identified as non-conformities from the previous Audit and those considered higher risk were included in the Audit Scope.

Re-Certification Audit and Scope Change (21 April 2026)

The Audit Scope includes production facilities of continuous cast Aluminium wrought alloys at EGA Leichtmetall GmbH facility located in Hannover, Germany.

The Supply Chain Activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

AUDIT OUTCOME	• Certification
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AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☒ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope. ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	28 June 2026 – 27 June 2029
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	28 December 2027
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CERTIFICATE NUMBER	251
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://Aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

EGA Leichtmetall (the 'Entity') is a speciality Aluminium foundry focused on the production of hard alloys and large-diameter billets, with an annual output of approximately 35,000 tonnes of Aluminium. The Entity sources around 80% of its input materials from secondary Aluminium, with a commitment to recycling and circular-economy principles. All operations are powered by 100% renewable electricity. The Entity's major capability is the in-house production of billets up to 1,080 mm in diameter — the largest turned billet diameter in Europe — enabling EGA Leichtmetall to serve the most demanding applications across aerospace, defence, and special engineering industries.

EGA Leichtmetall has been part of Emirates Global Aluminium (EGA) since 2024. It currently employs 64 people, of whom 8 are women. It holds both ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health & Safety) certifications.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	Medium	HIGH
RISKS	High	High	Medium	HIGH
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established systems to maintain awareness of and ensure Compliance with Applicable Law. The process is documented in a standard operating procedure, and the list of Applicable Laws is up to date.
1.2 Anti-Corruption	Conformance	The Entity prohibits all forms of Corruption, including Extortion and Bribery, which are addressed in the Entity's Code of Conduct.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct and an Entity Policy that includes principles relevant to environmental, social and governance performance. The Code of Conduct is available at: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented Environmental, Social, and Governance (ESG) Policies, which are reviewed during the annual management review. Business practices are reviewed to ensure compliance with Entity guidelines. Any outstanding issues can also be discussed during the monthly meetings. The Entity's Policies are displayed for employees across the Facility, and refresher training is provided annually.
2.2a-c Leadership	Conformance	The Entity has nominated a senior Management Representative. This individual has overall responsibility and authority for ensuring compliance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has an integrated, documented Environmental Management System and is certified to ISO 14001.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has an integrated and documented Environmental, Health & Safety and Social Management System that has been externally certified in accordance with Health, Safety, Environment & Energy (HSEE). An Analysis of fields of action was conducted with respect to the seven core subjects and principles of ISO 26000. The main aspects and impacts identified in the risk analysis have been considered and implemented in the Management System.
2.4a-e Responsible Sourcing	Conformance	The Entity has established systems to maintain awareness of and ensure Compliance with Applicable Law. A Responsible Sourcing Policy is available and documented in the Standard Operating Procedure for Purchase/Supplier. Together with the Code of Conduct, these address specific quality, social and environmental topics. https://www.ega.ae/media/clapfyhb/ega000183-responsible-sourcing-standards-may-2023.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects.

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 Major Changes or New Projects.
2.7a-f Emergency Response Plan	Conformance	The Entity has site-specific Emergency Response Plans developed and implemented, and the plan is available upon request.
2.8a-d Suspended Operations	Conformance	The Entity has established an ESG-based business resilience plan to safeguard and adapt operational processes in the event of external disruptions, and to conduct regular, risk-based reviews and ad hoc reviews in response to significant changes or control gaps.
2.9a-b Mergers and Acquisitions	Conformance	The Entity was acquired by Emirates Global Aluminium (EGA) in 2024, which is ASI Certified. Refer to: https://media.ega.ae/ega-completes-acquisition-of-leichtmetall-european-speciality-foundry-in-high-strength-recycled-Aluminium The Entity is located in a highly regulated country (Germany), where relevant projects and changes must undergo a thorough analysis and authorisation process, and it has systems in place to manage any potential mergers and acquisitions effectively.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity is located in a highly regulated country (Germany), where relevant projects and changes must undergo a thorough analysis and authorisation process, and it has systems in place to manage any potential Closure, Decommissioning and Divestment effectively.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the 2024 Sustainability Report, available at: https://www.leichtmetall.eu/en/sustainability During the Audit, additional quantitative data and internal management information were reviewed that exceeded the level of detail currently disclosed in the public report. These data are available within existing management systems and processes.
3.2 Non-compliance and Liabilities	Conformance	The Entity has not received significant fines, judgements, penalties, or non-monetary sanctions for failure to comply with Applicable Law since it joined ASI. The Entity discloses, through its annual reporting, information on significant fines, judgements, penalties, and non-monetary sanctions for failure to comply with Applicable Law. Details on any non-compliances or liabilities are reported in the German Company Register at: https://www.unternehmensregister.de/
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, and these are checked via an annual audit. No issues were reported in the previous report. Accounting / Financial reports are available in the German Company Register at: https://www.unternehmensregister.de/
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable, and culturally and gender sensitive Complaints Resolution Mechanisms, which are adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. Internal and external Stakeholders can access the Entity's anonymous

CRITERION	RATING	COMMENT
		whistleblowing system, which is available on the website: https://secure.ethicspoint.eu/domain/media/de/gui/100615/
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Life Cycle Assessment (LCA) covering its major Product lines. Life Cycle considerations are addressed at the EGA Entity level through group-wide sustainability and decarbonisation methodologies. Site-specific operational and material flow data from EGA Leichtmetall are provided as inputs where relevant.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's Life Cycle Assessment can be provided upon request. However, no requests have been made to date.
4.2 Product Design	Not Applicable	The Criterion is not applicable to the Entity, as it is not involved in the design and development process of products or components.
4.3a-b Aluminium Process Scrap	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and, where generated, targets 100% of Scrap for collection, recycling and/or reuse, and 100% of the scrap is remelted on-site. The Entity separates Aluminium alloys and grades for recycling.
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's goals related to circular economy principles include, e.g., 73% recycled Aluminium in production (saving 160,000 tons of CO₂ annually) and active sourcing of Post-Consumer Scrap from suppliers and customers. As a member of Aluminium Deutschland, WGM (https://wgm.berlin/), and BIR (https://www.bir.org), they collaborate on industry recycling standards and promote closed-loop processes, such as reintegrating production scrap into smelting. These initiatives are detailed in the 2024 Sustainability Report, pages 6-5: https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf All efforts are reviewed annually and communicated via training and Stakeholder dialogues. https://www.leichtmetall.eu/de/sustainability
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has independently verified its GHG Emissions and disclosed its emissions and energy use (page 44) at the group level in the EGA 2024 Sustainability Report: https://www.ega.ae/media/csdg3lpg/ega-2024-sustainability-report.pdf The Entity's GHG emissions are available in the Sustainability Report, page 15: https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf

CRITERION	RATING	COMMENT
		The Entity utilises software to calculate and track energy consumption and CO ₂ emissions, and it is ISO 50001 certified. The 2025 Sustainability Report is currently being prepared and is expected to be published in June 2025.
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 is fully included in the EGA group-level GHG Emissions reduction pathway and does not establish a separate standalone emissions reduction target or pathway. Target setting and trajectory governance are managed by EGA at the group-level in accordance with the ASI GHG Pathways Method. Historical emissions data from Leichtmetall are incorporated into the recalculated EGA baseline year to ensure consistency and comparability following EGA's acquisition. The reduction pathway covers Scopes 1, 2 and 3. The Entity already has an action plan in place to reduce emissions. More information is available in the 2024 Sustainability Report, pages 17-19: https://www.ega.ae/media/csdg3lpg/ega-2024-sustainability-report.pdf
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The target for 2030 is 8.4 t CO₂e per tonne of Aluminium in Scopes 1, 2 and 3. Emissions intensity has decreased from approximately 11.2 t CO₂e/t Al in 2020 to about 10.4 t CO₂e/t Al in the most recent reporting year. Given its comparatively low emissions intensity, the site does not create a material deviation from the EGA Group-level reduction pathway. More information is available in the EGA Group Sustainability Report 2024: https://www.ega.ae/en/sustainability/sustainability-reports ASI Aligned Decarbonisation Statement, at Group-level, is available at: https://www.ega.ae/media/lovfv2zk/ega-2025-decarbonisation-statement.pdf
5.4 GHG Emissions Management	Conformance	The Entity operates under a carbon budget, with quarterly reviews of measures and targets aligned with our ISO 50001 and ISO 14001 standards and the ASI methodology. Examples include 100 % green electricity (saving 5,190 tons CO₂/year), 73 % recycled Aluminium (saving 160,000 tons CO₂/year), and the 2045 carbon-neutrality target for Scopes 1 & 2, tracked via annual THG balances. Progress is documented in the 2024 Sustainability Report, page 15: https://www.leichtmetall.eu/de/sustainability
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	Emissions to Air measurements are carried out every three years by the external monitoring body, öko-control GmbH, and the last measurement was conducted on 5 June 2025. However, there are no plans to reduce emissions. The Material Emissions to Air are available in the 2024 Sustainability Report, page 16:

CRITERION	RATING	COMMENT
		https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf .
6.2a-g Discharges to Water	Conformance	The Entity does not discharge wastewater directly into rivers, creeks, or lakes; it discharges it indirectly into a publicly owned wastewater treatment plant. There are no protected areas or surface waters in the vicinity of the industrial and commercial park. No incidents involving substances hazardous to water have occurred in recent years, and no such substances have entered the sewerage system or groundwater. The Material Emissions to Water are available in the 2024 Sustainability Report, page 14: https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf .
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity conducts a risk assessment in accordance with legal requirements to identify potential Spills or Leaks. No Spills or Leaks have been identified recently.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has developed an Emergency Plan in the event of Spills or Leaks. No Spills or Leaks have been identified recently. More information is available in the 2024 Sustainability Report, page 14: https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has assessed the impact of its produced waste on people and the environment and is making efforts to reduce waste, for example, by recovering Aluminium from Scrap. More information about Hazardous and Non-Hazardous waste is available in the group report EGA Sustainability Report 2024, page 57: https://www.ega.ae/en/about-us/our-disclosures
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's Aluminium Dross is stored in a separate hall. The recovery of Aluminium through the processing of Dross and Dross residues is carried out by an external contractor, who endeavours to maximise Aluminium recovery. 100% of dross is recycle and regular inspections are carried out.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water abstraction and use, broken down by type and source, is managed in accordance with ISO 14001 standard and is disclosed in the 2024 Sustainability Report, page 14: https://www.leichtmetall.eu/media/raohljtm/251218_ega-leichtmetall_nachhaltigkeitsbericht_2024.pdf The Entity has conducted a Water Risk Assessment, and no relevant water-related risks were identified in the catchment area.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity and its water-related risks were assessed as low; no water management plan is needed.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located in a long-established industrial and business park. There are no Protected Areas within the Entity's Area of Influence. The Entity has conducted a Biodiversity Risk Assessment, and no relevant risks have been identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material impacts on Biodiversity or Priority Ecosystem Services identified in the risk assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material Biodiversity impacts identified in the risk assessment.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material impacts on Biodiversity or Priority Ecosystem Services identified in the risk assessment.
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. For example, attention is paid to compliance with ISPM 15 of the International Plant Protection Convention (IPPC).
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, as it is located in a long-established industrial and business park.
8.6a-d Protected Areas	Conformance	The Entity is located in a long-established industrial and business park. There are no Protected Areas within the Entity's Area of Influence.
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 respects Human Rights and observes the UN Guiding Principles on Business and Human Rights. A Policy commitment to respect Human Rights can be found in the Entity's Code of Conduct. The Code of Conduct is available at: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf Supplier evaluation is carried out, taking into account topics such as sustainability, human rights and social responsibility. According to the Human Rights Due Diligence check and as confirmed by Workers and management, the Entity has no salient adverse Human Rights impacts. The Entity has not caused or contributed to any such impacts.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Code of Conduct that ensures neutrality in recruitment and job advertisements. There are Trade Unions that represent Gender Equity and Women's Empowerment. The Entity

CRITERION	RATING	COMMENT
		participates in external initiatives promoting gender equity in the metals industry, including the “Women4Metals” initiative. More information is available in the group report EGA Sustainability Report 2024, page 91: https://www.ega.ae/en/about-us/our-disclosures
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 with their Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present with their 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 Indigenous Peoples or their lands, territories and resources are not present with their Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Cultural and Sacred Heritage features present within its Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not present with their Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements have been caused directly or indirectly by the Entity.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the Human Rights Due Diligence has not identified any issues affecting Local Communities, and the Entity is located in an industrial park.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity complies with the OECD Guidelines CAHRAS Due Diligence by implementing a risk-based supply chain Management System. It has a Metal Procurement Procedure, and regular audits are conducted by the purchasing department, and suppliers from Conflict-Affected and High-Risk Areas (CAHRAS) are excluded from the suppliers' list. The Code of Ethics applies: https://www.ega.ae/media/hrsfkigo/ega-code-of-ethics_en-2023.pdf. The Entity also conducts a supplier Human Rights Due Diligence process in accordance with the Code of Conduct: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts a supplier Human Rights Due Diligence and risk analysis. If risks are identified in the supply chain, an escalation process is initiated. First, a discussion is sought with the supplier. If no solution is found, the supplier is blocked.

CRITERION	RATING	COMMENT
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity's strategy to respond to risks in its supply chain includes a risk management plan with supplier audits, origin certificates, and targeted mitigation measures, overseen by senior management and reported quarterly. Various criteria, such as Human Rights or specific regions' risks, are examined.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirements of this Criterion. In addition, the Entity undergoes annual third-party audits of its Due Diligence practices to verify compliance with OECD Guidance for a conflict-free Aluminium supply chain.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity reports annually on supply chain Due Diligence in its 2024 Sustainability Report (pages 10, 18 and 23), covering conflict minerals, Human Rights compliance, and ASI-Certified Audits to ensure a conflict-free Aluminium supply chain.
9.9 Security practice	Conformance	The Entity has an external security service provider for the industrial park, hired by the industrial park itself. Human Rights are respected in line with recognised standards and good practices.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has established and freely elected a Workers' Committee in accordance with German law. Sufficient resources are provided, and Workers are free to join any local Trade Union organisations.
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, Freedom of Association and Right to Collective Bargaining is not restricted by Applicable Law in Germany.
10.2a-c Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182 and shall comply with related national and international law. Only employees equal to or older than 18 years are hired.
10.3a-c Forced Labour	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. The Entity's commitment against Forced Labour is available in the Code of Conduct: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf
10.4a-c Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. This was confirmed through interviews with Workers and their representatives.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	Open communication was evident during the Audit, facilitated by the small Entity size. The WhatsApp Group Leichtmetall channel facilitates communication throughout the site.
10.6a-g Violence and Harassment	Conformance	The Entity does not support Violence and Harassment, and it is avoided in all circumstances. The Entity has a whistleblower portal for reporting issues related to Violence and Harassment. A statement against all forms of Violence and Harassment is addressed in the Code of Conduct: https://www.leichtmetall.eu/media/dspmyfaf/code_of_conduct_en.pdf .
10.7a-c Remuneration	Conformance	The Entity respects Workers' rights to a living wage and ensures that wages paid for a normal working week meet at least a legal or industry minimum standard and are sufficient to meet Workers' basic needs and to provide some discretionary income. The Entity has a collective agreement. Payment is made in accordance with the Collective Bargaining Agreement and German law.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law on Working Time (including Overtime), public holidays, and paid annual leave. Working hours are recorded.
10.9a-b Informing Workers of Rights	Conformance	The Entity communicates with Workers regarding current legislation and maintains a legal register which is updated quarterly. Workers are informed about their rights through contracts, regular training, the board, monitors, and other mechanisms.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented Occupational Health and Safety (OH&S) Management System that complies with applicable national and international standards and is certified to ISO 45001.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	An annual audit of the OH&S is carried out according to ISO 45001. In addition, OH&S meetings are held regularly. Information regarding reportable accidents and the average number of sick days per employee compared to the industry average is available in the 2024 Sustainability Report, page 71: https://www.ega.ae/media/csdg3lpg/ega-2024-sustainability-report.pdf
11.2 Employee engagement on Health and Safety	Conformance	There are various opportunities for staff to get involved, including the Health and Safety Committee, the Works Council, and safety representatives.

ASI LIMITATION OF LIABILITY DISCLAIMER

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	19 January 2023	Initial Certification Audit – Provisional Certification
1	30 June 2023	Surveillance Audit – Full Certification
2	5 December 2024	Surveillance Audit
3	28 July 2026	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply V3.1 of the ASI Performance Standard. Member and Entity name change to reflect change of ownership, including revision to the Entity Name in the 2024 Surveillance Audit Scope