ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

UACJ Automotive Whitehall Industries, Inc.

CERTIFICATE NUMBER
427

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
BUREAU VERITAS CERTIFICATION

DATE OF ISSUE
25 FEBRUARY 2025

DATE OF EXPIRY
24 FEBRUARY 2028

CERTIFIED SINCE
25 FEBRUARY 2025

AUTHORISED BY

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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

Manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries, located in Guanajuato, Mexico, Ludington (Progress Dr.) and Ludington (Sixth St.) in Michigan, USA and Paducah, Kentucky, USA.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	UACJ Corporation
ENTITY NAME	UACJ Automotive Whitehall Industries, Inc.
CERTIFICATION SCOPE	Manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries, located in Guanajuato, Mexico, Ludington (Progress Dr.) and Ludington (Sixth St.) in Michigan, USA and Paducah, Kentucky, USA.
SUPPLY CHAIN ACTIVITIES	• Semi-Fabrication • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (8 – 10 October 2024) • Audit - Scope Change (29 – 31 October 2025) • Surveillance Audit and Scope Change (16 - 19 March 2026)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	• 8 – 10 October 2024 (Initial Certification Audit) • 29 – 31 October 2025 (Audit - Scope Change) • 16 - 19 March 2026 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	• 5 December 2024 (Initial Certification Audit) • 14 December 2025 (Audit - Scope Change) • 1 September 2026 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (8 – 10 October 2024)</u> The Audit Scope included the manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Guanajuato, Mexico Supply chain activities included in the Audit Scope: • Semi-Fabrication • Material Conversion All applicable Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Scope Change Audit (29 – 31 October 2025)</u> The Audit Scope included the manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Ludington (Progress Dr.) and Ludington (Sixth St.), Michigan, USA. Supply chain activities included in the Audit Scope:

	• Semi-Fabrication • Material Conversion All applicable Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit and Scope Change (16 – 19 March 2026) The Audit Scope included the manufacture of custom Aluminium extruded shapes with precision fabrication and assembly for customer specific designs at UACJ Whitehall Industries located in Guanajuato, Mexico and in Paducah and Kentucky USA. Supply chain activities included in the Audit Scope: • Semi-Fabrication • Material Conversion All applicable 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	25 February 2025 - 24 February 2028
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	23 February 2028
CERTIFICATE NUMBER	427
	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

Founded in 1974, UACJ Automotive Whitehall Industries (UWH) specialises in precision extruded Aluminium components and assemblies for the automotive industry. With headquarters in Ludington, Michigan, and additional plants in Paducah, Kentucky; Flagstaff, Arizona; and San Miguel de Allende, Guanajuato, Mexico, UWH serves a diverse range of customers across North America.

The 'Entity' comprises the Mexico site and three North American sites: Ludington (Progress Dr.), Ludington (Sixth St.) and Paducah.

The Mexico Facility commenced operations in 2011, underwent an expansion in 2020 and currently has 358 employees on site, of whom 228 are women. The Mexico site's primary products include sunroof tracks, convertible top components, and structural components, with its primary activities including CNC Machining, Bending, Welding, Fabrication, Assembly and CMM analysis. In 2024, it shipped approximately 9,000 tonnes of products to the North American and European markets.

The Ludington (Sixth St.) site commenced operations in 2001, and the Ludington (Progress Dr.) site commenced operations in 2017. Across these two sites, are produced approximately 24,278 tonnes (Fiscal 2024) of Aluminium products, including sunroof tracks, structural components, luggage rack components, convertible top components and other automotive components, with its primary activities including Extrusion, CNC Machining, Bending, Welding, Fabrication, Assembly, CMM analysis and Engineering/Design. Together, approximately 440 people are employed, including 119 women.

The activities at Paducah include extrusion presses and fabrication of customer-specific components for the automotive industry, with an annual production of 6,000 tonnes of Aluminium. The Paducah Facility currently has 144 employees on site, including 46 women.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity's legal compliance is assured via the UACJ Group Code of Conduct Handbook and the UACJ Group Compliance with Competition Law Policy. Each UACJ Facility maintains a legal registry, which is reviewed and approved by site leadership.
1.2 Anti-Corruption	Conformance	The Entity works to prevent Corruption and Bribery in accordance with Applicable Law and has established the UACJ Group Anti-Bribery Code of Conduct and Policy on Prevention of Bribery, both documents available at: https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01
1.3a-e Code of Conduct	Conformance	The Entity has implemented the UACJ Group Code of Conduct to establish Environmental, Social and Governance (ESG) requirements, available at: https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01 https://www.uacj.co.jp/english/company/governance/pdf/guideline.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented the UACJ Group Policies that address ESG related practices. The Policies are reviewed and updated periodically and communicated both to internal and external Stakeholders, available at: https://www.uacj.co.jp/english/sustainability/environment/management.html
2.2a-c Leadership	Conformance	The Entity has identified the Plant Manager at each Facility as responsible and authorised to ensure Conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has integrated environmental and social management principles into its Management System. The UACJ Group has established an Environmental Committee as a body that represents the entirety of the Group. The Environmental Committee, chaired by the President, has a membership consisting of UACJ executives, chief executives, plant managers, and presidents of principal Group companies. The Committee meets three times a year to provide updates on the status of environmental activities and discuss aims and objectives for the following fiscal year's environmental activities.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has incorporated the UACJ Group, social management principles and tenants into its Management System. The UACJ Group Code of Conduct emphasises respect for basic Labour Rights, and states that employees' basic rights to work shall be respected in accordance with various labour-related laws and regulations in each country and region.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented the UACJ Sustainable Procurement Guidelines in accordance with UACJ Corporate CSR Deployment Guidelines and the UACJ Automotive Whitehall Supplier Handbook. The UACJ Group Sustainable Procurement Guidelines are available at: https://www.uacj.co.jp/english/sustainability/social/fairtrade.html
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, when considering a new site or project expansion, the potential environmental, social, cultural and Human Rights impacts are assessed.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities. However, when considering a new site or project expansion, the potential environmental, social, cultural and Human Rights impacts are assessed. The UACJ Human Rights Policy (Section 7) outlines its commitment to identify the negative impacts and risks of Human Rights in business activities: https://www.uacj.co.jp/english/sustainability/social/human-rights.html
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented site-specific Emergency Response Plans. These Plans are developed with consideration and input from the Workers and the Local Community. The Entity's contingency plan is available to the public upon request and has been provided to the local agencies.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a contingency plan that specifies specific situations that may significantly affect or suspend the Entity's activities. These situations are simulated and evaluated annually to determine the actions necessary to reduce or mitigate the impacts.
2.9a-b Mergers and Acquisitions	Conformance	As part of the UACJ Group, the Entity reviews ESG issues as part of its Due Diligence process for mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	As part of the UACJ Group, the Entity reviews ESG issues in the planning process for closure.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity reports its Group governance approach and Material environmental, social and economic impacts via the UACJ Integrated Report, available at: https://www.uacj.co.jp/english/ir/library/factbook.html Additionally, the Entity has disclosed a Sustainability Report specific to the UACJ Whitehall facilities in North America, available at: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity commits to publicly disclose non-compliances or liabilities in accordance with Applicable Law. Any significant fines and non-monetary sanctions for non-compliance with environmental laws

CRITERION	RATING	COMMENT
		and/or regulations are disclosed as part of the 2024 Integrated Report and the GRI Standard Index, section 307-1: https://www.uacj.co.jp/english/sustainability/gri-standard.html
3.3a-c Payments to Governments	Conformance	The Entity has implemented the Group Anti-Bribery Regulations and the Global Guidelines on Bribery, which prohibit Bribery: https://www.uacj.co.jp/english/sustainability/management/pdf/compliance_02.pdf The Entity makes only legal payments to governments and other entities, as outlined in its Code of Conduct and Anti-Bribery Policy. During the reporting period, the Entity has not made any payments to governments, including political parties, nor has it made any financial or in-kind political contributions, either directly or indirectly through intermediaries: ASI Certification - UACJ Automotive Whitehall Industries, Inc
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented plant-level procedures to address employee issues and concerns in accordance with the Whitehall Employee Handbook. Globally, the UACJ Group operates an internal reporting system designed to prevent compliance issues altogether or detect them early. This system has internal and external channels that employees or Stakeholders can access anonymously. Measures are in place to accept complaints via telephone, postal mail, email, and other channels. Complaints can also be received by the Plant Manager at each location. All complaints are logged and tracked in the site's corrective action database. Internal and external Stakeholders' complaints can be submitted via the customer portal at: https://www.uacj.co.jp/english/inquiry/index.html
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Corporate Sustainability Division works closely with the operational sites to provide life cycle information for its major Product lines. This information is disclosed at: https://www.uacj.co.jp/english/sustainability/environment/climate.htm
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Corporate Sustainability Division works closely with the operational sites to provide Life Cycle information. Life cycle studies and information are available on the UACJ Corporate website at: https://www.uacj.co.jp/english/sustainability/environment/climate.htm
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as Product specifications are established by the Entity's customers based on their product requirements. However, the Entity works with customers to meet their demand for Products with a lower environmental impact.
4.3a-b Aluminium Process Scrap	Conformance	The Entity reviews opportunities to maximise the recycling and reuse of Aluminium Process Scrap at all sites. It establishes, tracks, and reviews plant-level scrap recycling targets weekly. In addition, the Entity has established systems to separate Aluminium alloys and grades for recycling during extrusion and fabrication. At the Progress Street site, specialised machinery is installed to turn Aluminium chips

CRITERION	RATING	COMMENT
		into pucks for more efficient recycling. Most Scrap is returned to the Entity's primary Aluminium provider.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The End of Life strategy for the Entity's Products is the responsibility of the automotive Original Equipment Manufacturers (OEM) customers. However, where possible, the Entity supports the customer's End of Life strategies for collection and recycling. The Group's current strategies to increase Aluminium recycling and to utilise more Recycled Aluminium are available in the Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/full_2025uacjr.pdf and at: https://www.uacj.co.jp/english/ir/library/pdf/2025/05_2025uacjr.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The End of Life strategy for the Entity's Products is the responsibility of the automotive Original Equipment Manufacturers (OEM) customers. However, where possible, the Entity supports the customer's End of Life strategies for collection and recycling. The current strategies to increase Aluminium recycling and to utilise more Recycled Aluminium are available in the 2024 Sustainability Briefing Presentation: https://www.uacj.co.jp/english/ir/library/pdf/2025/sus_01.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity discloses its energy consumption and GHG Emissions, Scope 1 and 2, for its North and Central American facilities in the Whitehall Sustainability Report: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf Energy consumption, CO_2 emissions, and GHG Scope 3 information, at the Corporate Level, is available in the UACJ Corporate Annual Integrated Report, available at: https://www.uacj.co.jp/english/ir/library/factbook.htm#ac2025 The UACJ Corporation's energy and emissions data are independently verified annually, with the 2025 Independent Assurance Statement for: https://www.uacj.co.jp/english/sustainability/assurance/index.htm
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 Greenhouse Gases (GHG) Emissions Reduction Plan and Pathway for its North American facilities. This Plan was developed using the ASI GHG Pathway Calculation Tool. All information is summarised and reported through the UACJ corporate website and included in the annual Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/05_2025uacjr.pdf The Entity has determined that it needs to reduce its GHG emissions by 75% by 2030, compared to 2022, to achieve a target of 0.210 tonnes

CRITERION	RATING	COMMENT
		of CO_2 per tonne shipped, according to data calculated using the GHG Pathway Calculation Tool. UACJ has established a road map to achieve carbon neutrality for Scope 1 and 2 emissions by 2050. For 2030, UACJ has set a goal of reducing CO_2 emissions per unit of production by 30% relative to the 2019 baseline. Additionally, the Entity has disclosed a Sustainability Report for its North American facilities: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established GHG Emissions Reduction Plan for its North American facilities. This Plan was developed using the ASI GHG Pathway Calculation Tool. All information is summarised and reported through the UACJ corporate website and included in the annual Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/05_2025uacjr.pdf The Entity has determined that they need to reduce 75% of their GHG emissions by 2030 compared to 2022 to achieve the target of 0.210 tonne per CO_2 per tonne shipped according to data calculated for the GHG Pathway Calculation Tool. UACJ has established a road map to achieve carbon neutrality for Scope 1 and 2 emissions by 2050. For 2030, UACJ has set a goal of reducing CO_2 emissions per unit of production by 30% relative to the 2019 baseline. Additionally, the Entity has disclosed a Sustainability Report for its North American facilities: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf
5.4 GHG Emissions Management	Conformance	In April 2024, UACJ joined the 'GX League', a group of various companies and organisations working to achieve carbon neutrality. The Entity tracks CO_2 and energy consumption data monthly.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Air emissions at the Mexico Facility are disclosed in an annual report to the regulatory agency, as required by local regulations. All emissions are below regulatory requirements, and no action plans are required. For the Ludington and Paducah plants, the air emissions associated with the operations are exempt from regulatory permitting, and no action plans are required. Further information is available at: https://www.uacj.co.jp/english/sustainability/environment/climate/ UACJ Corporate discloses emissions associated with its business activities, available at: https://www.uacj.co.jp/english/sustainability/environment/climate/ Information specific to the Entity is available in the UACJ Whitehall Sustainability Report: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf

CRITERION	RATING	COMMENT
6.2a-g Discharges to Waters	Conformance	For the Mexico site, a certified laboratory conducts an annual assessment in accordance with Mexican legislation to verify the quality of the water generated and discharged by the processes and equipment used at the site. Water discharges are disclosed as part of the annual reporting required by the regulatory body and as part of its material balance, which includes discharges of industrial wastewater: https://www.uacj.co.jp/english/sustainability/environment/enterprise.htm The Ludington and Paducah sites are regulated by local water and stormwater discharge permits and have not identified any water usage/releases to the environment nor exceeded any water discharge limits. Further information is available in the UACJ Whitehall Sustainability Report: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity conducts risk assessments and identifies potential Spills of hazardous substances that may cause adverse environmental impacts. Spill risks and management procedures are included in each site's Spill Prevention and Emergency Action Plans.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has completed a Spills risk assessment as part of its Emergency Action Plan, and procedures for reporting any significant Spills, per local regulations, are included in each site's Emergency Action Plan. There have been no significant Spills at the site in the past year.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste Management Plan with strategic initiatives focused on reducing or eliminating Waste (Hazardous Waste, Non-Hazardous Waste, recoverable, and non-recoverable), and the Plan is in accordance with corporate Policies. Waste generation and management information is disclosed on the website and in the UACJ Whitehall Sustainability Report at: https://www.uacj.co.jp/english/sustainability/environment/emission.htm#ac02 https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors water usage and includes the data in the Energy Consumption and CO_2 Emission Calculation Sheets, and maintains a water balance that identifies site-specific inputs, outputs, uses, quantities, and water supply. Information on water consumption and resources is disclosed as UACJ Group consolidated data, available at: https://www.uacj.co.jp/english/sustainability/environment/enterprise.html

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		Additional information is available in the UACJ Whitehall Sustainability Report: https://www.whitehallindustries.com/wp-content/uploads/UACJ-Whitehall-Automotive-Sustainability-report-2026.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity presents no Material risks to local water supplies.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has completed a Biodiversity assessment to evaluate the potential risks and impacts on Biodiversity associated with its current land use and activities. No specific Biodiversity impacts have been identified for the Mexico, Ludington and Paducah sites.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks or impacts identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks, or impacts identified.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no Material Biodiversity and Ecosystem Services risks, or impacts identified.
8.4 Alien Species	Conformance	All import and export shipments from the Entity use heat treated pallets to prevent the introduction of Alien Species from suppliers and to receiving locations.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not explore or develop New Projects within World Heritage Properties, and this commitment is documented in the Global Code of Conduct. The Mexico Facility is located on the outskirts of the city, and according to UNESCO information, only the centre of San Miguel de Allende is considered a World Heritage Site. The Ludington and Paducah sites do not impact any World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has referenced the World Database on Protected Areas (WDPA) to identify Protected Areas. No Protected Areas have been identified within the Entity's Areas 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 implements the Human Rights requirements outlined in the UACJ Group Code of Conduct and in the UACJ Human Rights Policy. The Human Rights Policy is available at:

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		https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_CSR_HumanRightsPolicy_en.pdf The Entity has implemented and conducted Human Rights Due Diligence to identify, mitigate, and prevent Human Rights risks throughout its operations and business activities. Training on Human Rights issues has been provided to all Workers through the Group Code of Conduct. Information on the Human Rights Due Diligence is included in the UACJ Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/full_in_2025uacjr.pdf The Entity has two key initiatives to eradicate Human Rights abuses: https://www.uacj.co.jp/english/ir/policy/long_term_vision.htm
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is making a concerted effort to expand opportunities for women to play an active role in its operations and has established targets to increase the percentage of women in its workforce to at least 20%. The Ludington sites are actively recruiting women for open positions. Women in managerial positions are a key metric tracked by the Entity and are presented as one of the five Materiality targets in the UACJ Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/full_in_2025uacjr.pdf https://www.uacj.co.jp/english/sustainability/social/diversity.html.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Areas of Influence, with all Facilities located within existing industrial parks.
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 in the Entity's Areas of Influence, with all Facilities located within existing industrial parks.
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 New Projects or Major Changes that require Free, Prior and Informed Consent (FPIC).
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 sites or values in the Entity's Areas of Influence. The Facilities are located and operate within existing industrial parks.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as operations do not affect Indigenous Peoples' lands, territories, resources or cultural and sacred heritage.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes that require resettlement.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	The Entity engages with Local Communities to ensure local legal rights are respected and that no negative community impacts are created from their operations and has Policies and procedures outlining these requirements.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity does not operate in nor purchases raw materials from Conflict-Affected and High-Risk Areas (CAHRAs). The Sustainable Procurement Policy is available at: https://www.uacj.co.jp/english/sustainability/social/pdf/UACJ_Sustainable_Guidelines.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity's risk assessment process is outlined in their Supplier Quality Manual. Suppliers are reviewed and assessed at least every three years to ensure they comply with the Sustainable Procurement Guidelines and that any identified risks are addressed. All Aluminium suppliers for the Entity must be International Automotive Task Force (IATF) certified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's suppliers are reviewed and assessed at least every three years to ensure they comply with the Sustainable Procurement Guidelines and that any identified risks are addressed.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	Suppliers are reviewed and assessed at least every three years to ensure they comply with the Entity's Sustainable Procurement Guidelines. This information is reviewed at least annually by the Entity's Compliance Committee and is disclosed on its website: https://www.uacj.co.jp/sustainability/msa/pdf/2024_msa.pdf The Compliance Committee reviewed and approved the statement in September 2025. The Entity's Human Rights Due Diligence efforts are included in the UACJ Group Integrated Report: https://www.uacj.co.jp/english/ir/library/pdf/2025/full_in_2025uacjr.pdf
9.9 Security practice	Conformance	The Entity utilises a third-party company to provide security services at the Mexico Facility. Security practices and respect for Human Rights are addressed in accordance with local laws and regulations and are included in the contract language. Security personnel must also complete the UACJ Code of Conduct training. The Ludington and Paducah sites do not utilise third-party security personnel.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The UACJ Group Code of Conduct addresses Freedom of Association and the Workers' right to form or join Labour Unions. Employees at the Mexico site belong to a Labour Union, and a labour agreement is in place. The Ludington and Paducah sites are non-Union.

CRITERION	RATING	COMMENT
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 Mexican and United States' law does not restrict Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	The Entity verifies Workers' age upon hire. Review of employment records confirmed that there are no Workers under 18 years.
10.3a-c Forced Labour	Conformance	The UACJ Group Code of Conduct stipulates that neither Child Labour nor Forced Labour is allowed by any UACJ entity. The Entity does not hold any employee identification papers, and all employees are verified at the time of hire and are required to be registered to pay the government required social security taxes. The UACJ Statement on Modern Slavery was approved by the company's Board of Directors and is available at: https://www.uacj.co.jp/sustainability/msa/pdf/2024_msa.pdf
10.4a-c Non-Discrimination	Conformance	The UACJ Group Code of Conduct stipulates that the Entity must respect the Human Rights of all people and not engage in irrational Discrimination or Harassment based on race, creed, gender, language, religion, ideology, or social origin. Training on the Code of Conduct is provided to all employees. Further information on diversity and equal opportunity is available at: https://www.uacj.co.jp/english/sustainability/social/diversity.html
10.5 Communication and engagement	Conformance	The Entity encourages open engagement with Workers, both between Worker Committees and individually. Workers are encouraged to participate and engage without fear of reprisal.
10.6a-g Violence and Harassment	Conformance	The Entity does not engage in corporal punishment, mental or physical coercion, verbal abuse or harassment. This is outlined in the Group Code of Conduct and in the Human Rights Policy, which is available at:https://www.uacj.co.jp/english/sustainability/management/compliance.htm#ac01 Any actions that would be taken if a complaint was made would be discussed, and there are procedures in place which include consultation with the employee and any union representative. No complaints have been received.
10.7a-c Remuneration	Conformance	The Entity pays living wages based on the area and/or established by the labour contract and in accordance with the applicable local law. Working Time is maintained in an electronic pay system. Employees are paid weekly via an automatic bank deposit.
10.8a-c Working Time	Conformance	The Entity operates on three shifts, with shift schedules in accordance with local law and the labour contract. Working hours are recorded in an electronic payroll system. Vacation and holidays are also paid in accordance with local law.
10.9a-b Informing Workers of Rights	Conformance	Workers' rights are clearly presented in the employment agreement that all employees must sign before commencing employment. This is also outlined in the site-specific Employee Handbook.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System at the Division level for all of UACJ Whitehall locations, which is reviewed annually by the EHS department in order to ensure that all established local laws and regulations are complied with and that all established procedures are reviewed and approved by the Plant Manager at each of the North America Locations. The Entity has implemented a Group Policy specific to Health and Safety. This Policy is communicated to all employees and is available at: https://www.uacj.co.jp/english/sustainability/social/safety.htm
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The OH&S Management System elements are published on the UACJ website which includes performance data, including leading and lagging indicators and comparative analyses with peer businesses: https://www.uacj.co.jp/english/sustainability/social/safety.htm
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented an active Safety Committee that meets at least monthly and includes representatives from the 'shop floor' as well as from management. The most recent Safety Committee meeting minutes were reviewed, and the meetings included feedback from the employees identifying potential safety issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 February 2025	Initial Certification Audit – Full Certification
1	16 March 2026	Audit - Scope Change Sites added to the Certification Scope include Ludington (Sixth St.) and Ludington (Progress Dr.)
2	22 October 2026	Surveillance Audit and Scope Change. Scope Change to add the Paducah facility.