ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Hammerer Aluminium Industries Extrusion Germany GmbH

CERTIFICATE NUMBER
382

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
TÜV RHEINLAND CERT GMBH

DATE OF ISSUE
6 JUNE 2025

DATE OF EXPIRY
5 JUNE 2028

CERTIFIED SINCE
22 AUGUST 2024

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

Production of extruded Aluminium profiles, fabricated and surface-treated Aluminium profiles, fabricated and welded Aluminium components located at Soest, Germany.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion Germany GmbH
CERTIFICATION SCOPE	Production of extruded Aluminium profiles, fabricated and surface-treated Aluminium profiles, fabricated and welded Aluminium components located at Soest, Germany.
SUPPLY CHAIN ACTIVITIES	• Semi-Fabrication • Material Conversion
ASI STANDARD	Performance Standard V3.1 2023
AUDIT TYPE	• Initial Certification Audit (5 – 9 February 2024) • Surveillance Audit (20 – 24 January 2025) • Surveillance Audit (7 – 9 July 2026)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	• 5 – 9 February 2024 (Initial Certification Audit) • 20 – 24 January 2025 (Surveillance Audit) • 7 – 9 July 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 24 June 2024 (Initial Certification Audit) • 9 April 2025 (Surveillance Audit) • 24 August 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (5 – 9 February 2024)</u> The Audit Scope included the entire production site HAI Extrusion Germany GmbH located in Soest, Germany. Supply chain activities included in the Audit Scope: • Semi-Fabrication • Material Conversion All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (20 – 24 January 2025)</u> The Audit Scope included the entire production site HAI Extrusion Germany GmbH located in Soest, Germany. Supply chain activities included in the Audit Scope: • Semi-Fabrication • Material Conversion

	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (7 – 9 July 2026) The Audit Scope included the entire production site HAI Extrusion Germany GmbH located in Soest, Germany. Supply chain activities included in the Audit Scope: • Semi-Fabrication • Material Conversion 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	6 June 2025 – 5 June 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	5 June 2027
CERTIFICATE NUMBER	382
	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

The Hammerer Aluminium Industries (the 'HAI Group'), headquartered in Ranshofen/Braunau (Upper Austria), produces complete Aluminium solutions (Aluminium extrusion profiles machined and unmachined and processed products) for the transport, building and construction, electrical and mechanical engineering and plant engineering sectors. The HAI Group has existed in this form since 2007 and has achieved significant growth in recent years.

In the seventeen years since the HAI Group was founded, it has expanded to eight facilities located in four countries. The annual tonnage processed has increased to 25,000 tonnes, and the turnover has multiplied from 110 million euros to approximately 900 million in 2023. The team has expanded from 350 to approximately 2,000 employees.

HAI offers innovative solutions made of Aluminium covering the entire value chain from recycled input material to sophisticated profiles and complex components, considering all sustainability aspects. The Entity relies on 'state-of-the-art' production Facilities and comprehensive research and development, especially for new alloys.

Hammerer Aluminium Industries Extrusion Germany GmbH ('the Entity') is part of the HAI Group. The Entity produces extruded Aluminium profiles, fabricated and surface-treated Aluminium profiles, fabricated and welded Aluminium components located at the Facility in Soest, Germany. The Entity is equipped with three direct extrusion presses, offering press forces ranging from 2,200 to 4,400 tonnes. Additionally, it features advanced milling capabilities, gas-shielded welding, mechanical joining and riveting, precision cutting, specialised machinery, and a prototyping area.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Low	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Low	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes to identify, evaluate and comply with legal requirements and other binding obligations. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body (TÜV Rheinland Cert). The ISO certifications are disclosed at: https://www.hai-aluminium.com/en/download-center The Entity has implemented these systems through a legal database to maintain awareness of and ensure Compliance with Applicable Law. HAI Group Headquarters supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms and has implemented a Code of Conduct which is communicated both internally and externally. The Entity has also provided training to employees on business ethics. The HAI Group operates a 'whistleblowing' hotline where potential breaches or suspected cases of unethical behaviour can be reported confidentially: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852 An external tax auditor annually audits the Entity's financial system, and no financial irregularities were observed since the HAI Group joined ASI. The Code of Conduct is available at: https://www.hai-aluminium.com/en/download-center
1.3a-e Code of Conduct	Conformance	The HAI Group's Code of Conduct has been issued and communicated both internally and externally at: https://www.hai-aluminium.com/en/download-center The Code addresses mutual trust, sustainable business relationships, independence and integrity, fair and safe working conditions, environment, energy, and sustainability. The Code is regularly reviewed and was last reviewed in early 2025. The Entity has provided training to employees regarding business ethics. The HAI Group operates a 'whistleblowing' hotline where potential breaches or suspected Corruption and misconduct can be reported confidentially: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and published its Corporate Social Responsibility Policy and a separate Environmental, Energy, Occupational Health & Safety Policy. Both documents are available at: https://www.hai-aluminium.com/en/download-center The Entity has also issued its Code of Conduct for employees and suppliers. The documents are endorsed by the Group's senior management. The Entity is certified against the ISO 14001, ISO 45001, ISO 50001, ISO 9001 and IATF16949 management system standards.

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	The Entity's Managing Director has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard, leading the communication of the Entity's policies and providing sufficient resources to support its implementation. Responsibilities are reflected in the organisational chart. HAI Group's Quality Manager is responsible for the implementation of the ASI Performance Standard within the HAI Group.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System which has been certified according to ISO 14001:2015 by an accredited certification (TÜV Rheinland Cert). The certificate is available at: https://www.hai-aluminium.com/en/download-center The latest external ISO audit report did not identify any non-conformity relating to the Entity's Environmental Management System.
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	The Entity demonstrates compliance with social regulations and principles with some processes documented and a documented framework for all relevant social rules and activities has been developed. At the time of the Audit, this framework was available as a draft only and was not yet fully implemented.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The HAI Group has implemented and disclosed its Responsible Sourcing Policy as a 'Code of Conduct for Suppliers', available at: https://www.hai-aluminium.com/en/download-center The Entity's sourcing process is documented, and regular Due Diligence and supplier evaluations are undertaken. For Scrap dealers, the supplier risk evaluation however does not cover all relevant Environmental, Social and Governance (ESG) aspects.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	Since the Entity joined ASI, the Entity has completed two building projects, a new production hall and a new office building. Both projects were subject to a rigorous permitting process. The HAI Group did not consider these projects to require an Environmental or Social Impact Assessment, as their process provides a threshold for new projects or modifications to existing facilities requiring such an assessment, which was not exceeded.
2.6a-h Human Rights Impact Assessment	Not Applicable	Since the Entity joined ASI, the Entity has completed two building projects, a new production hall and a new office building. The Entity demonstrated that it has evaluated the need for Human Rights Impact Assessments. The HAI Group did not consider these projects to require an Environmental or Social Impact Assessment, as their process provides a threshold for new projects or modifications to existing facilities requiring such an assessment, which was not exceeded.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented a site-specific Emergency Response Plan. The Plan was developed in collaboration with relevant Stakeholders such as the local fire brigade. The Plan is available to relevant Stakeholders on request.

CRITERION	RATING	COMMENT
		The provisions of the Plan are tested regularly, with the latest evacuation drill being undertaken shortly before the Audit.
2.8a-d Suspended Operations	Conformance	The Entity has addressed environmental impacts of normal and abnormal situations as part of its ISO 14001 certified Environmental Management System. Due to the nature of the business (i.e. extrusion), the environmental impacts of a suspended operation are likely to be of limited scale. A documented Business Resilience Plan has been established.
2.9a-b Mergers and Acquisitions	Conformance	The Entity's management confirmed that it has not undergone, nor has plans for any Merger or Acquisition (M&A) activity since they have joined ASI. As part of the HAI Group process, the Entity has a documented process to manage M&A activities.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closure, decommissioning and divestment. There have been no such events since 2015 when HAI Group acquired the site.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts via HAI Group's Sustainability Report, which has been developed based on the reporting standard of the Global Reporting Initiative (GRI): The Report is available at: https://www.hai-aluminium.com/en/download-center
3.2 Non-compliance and Liabilities	Conformance	No significant fines, judgments, penalties and non-monetary sanctions were enforced during 2025, which was disclosed via the HAI Group 2025 Sustainability Report on page 82: 'During the reporting period, no fines or non-monetary penalties were imposed for non-compliance with environmental laws and regulations or for serious breaches of other applicable legal provisions'. The Report is available at: https://www.hai-aluminium.com/en/download-center
3.3a-c Payments to Governments	Conformance	In the HAI Group Sustainability Report 2025, it is confirmed that the Group did not make any payments to Governments or political parties and/or politicians. The Report is available at: https://www.hai-aluminium.com/en/download-center
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's Code of Conduct includes contact details of the legal counsel and is made available to Stakeholders. The Code of Conduct is disclosed at: https://www.hai-aluminium.com/en/download-center Similarly, the 2025 Sustainability Report (page 82) includes a dedicated email address for stakeholders to raise their concerns: ethics@hai-aluminium.com The Entity received one internal complaint in 2025, which was resolved to the satisfaction of all parties involved. A 'whistleblower' hotline is also in place, and a description of the mechanism is available at: https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852
4. MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has evaluated the life cycle impacts of its major Products in a Life Cycle Assessment (LCA) study, The study was developed by a specialised external institute. Whilst this study is not publicly available the Entity provides LCA information upon request. At the time of the Audit, the LCA study was incomplete however, as it only provides the global warming potential (in kg CO_2eq/kg extruded Aluminium) and currently does not include or consider other impact categories.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity confirmed that it will provide adequate 'cradle-to-gate' life cycle information upon customer request. HAI Group ensures that any public communication on LCA will include public access to the LCA information and its underlying assumptions, including system boundaries.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity as it has no design responsibility, as the Entity's customers (both for extrusion and processing departments) specify all design requirements.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented systems and a program to recycle 100% of its Aluminium Process Scrap within its operations, within the HAI Group or with external partners. The Entity has achieved close to a 100% recycling rate of Scrap.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	HAI Group actively contributes to the Circular Economy and not only recycles its internal Scrap but also purchases Secondary Aluminium from external providers. The Entity's recycling strategy is directed by HAI Group's remelting/casting plants, which are collecting the Aluminium Scrap (including the 'end-of-life' products) for the Groups own melting and casting production. Approximately 80% of Aluminium inflows are Secondary Aluminium, as disclosed in the Group's Sustainability Report, available at: https://www.hai-aluminium.com/en/download-center A documented recycling strategy specific to the Entity, including specific timelines, activities and targets has not however been made publicly available.
4.4d Collection and Recycling of Products at End of Life	Conformance	As a manufacturer of automotive parts, the Entity supplies their products to other businesses ('B2B') and not to consumers ('B2C'). The HAI Group co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products and works with national and international scrap dealers to secure the material for their re-melting/casting plants. Approximately 80% of Aluminium inflows are Secondary Aluminium, as disclosed in the Group's Sustainability Report, available at: https://www.hai-aluminium.com/en/download-center
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The HAI Group has disclosed its Greenhouse Gas (GHG) emissions and energy use by source in its Sustainability Report 2025, pages 34 and 39: https://www.hai-aluminium.com/en/download-center Independent verification of these data is confirmed in page 9 of the Report.

CRITERION	RATING	COMMENT
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 HAI Group has established both a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway that are Entity specific and were developed using the ASI endorsed methodology. Both documents are publicly available in the addendum to the Sustainability Report 2025, available at: https://www.hai-aluminium.com/en/download-center The GHG Emissions Reduction Pathway has a baseline year of 2019 and sets intermediate targets.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The HAI Group has established both a GHG emissions reduction plan and a GHG emissions reduction pathway that are Entity-specific and were developed using the ASI endorsed methodology. Performance against the plan and pathway are publicly available in the addendum to the Sustainability Report 2025, available at: https://www.hai-aluminium.com/en/download-center The GHG emissions reduction pathway has a baseline year of 2019 and sets intermediate targets.
5.4 GHG Emissions Management	Conformance	The Entity demonstrated that a system and processes are in place to implement its GHG reduction targets. The GHG Management System is integrated into the Entity's Environmental Management System, which is certified to ISO 14001 and ISO 50001.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The HAI Group has disclosed Entity-specific data on Material Emissions to Air in the HAI Group's Sustainability Report 2025, pages 35-36: https://www.hai-aluminium.com/en/download-center Material emissions, notably carbon monoxide (CO) and nitrous oxides (NOx) are specifically made publicly available in this Report. Plans to minimise exposure to and impacts from these emissions to air are integrated in the GHG emissions minimisation plan.
6.2a-g Discharges to Water	Conformance	The Entity directly discharges its stormwater to the receiving waters of the Schledde creek. Effluents are discharged into the publicly owned treatment works. The Entity has disclosed its water consumption in the Sustainability Report 2025, pages 40-41: https://www.hai-aluminium.com/en/download-center A plan to minimise potential impacts from discharges to water is not required as the risk and impacts have been rated low.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Within the scope of its ISO 14001 certified Environmental Management System, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakages may contaminate air, water,

CRITERION	RATING	COMMENT
		or soil. The Entity has established and implemented a management plan, communication plans, compliance controls and a monitoring programme to prevent and detect spills and leakages. The Entity does not currently need to disclose a management plan to remediate Spills or Leakages, as the risk has been identified as low. Should a Spill or Leakage occur in future, the Entity has a reporting process that specifies publication in the HAI Group Sustainability Report.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Should a Material Spill or Leakage occur, the Entity will report them via the HAI Group's annual Sustainability Report. Disclosure of Spills and Leakages for the HAI Group is included in the Report, page 47, where it is stated that in 2025, there were no Leaks or Spills in the HAI Group, nor were there any significant releases of substances: https://www.hai-aluminium.com/en/download-center
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management strategy in line with its ISO 14001 certification. Different types of Scrap and Waste, such as Hazardous Waste, recyclable Waste, and Aluminium Scrap are segregated and disposed of, treated or recycled in accordance with local law. The Entity conducted a documented assessment to identify and evaluate the impact on humans and the environment of the generated Waste. The HAI Group reports Entity-specific data on the generated quantities of Hazardous and Non-Hazardous Waste in the Sustainability Report 2025, pages 42-45: https://www.hai-aluminium.com/en/download-center The publicly disclosed recycling strategy can be found on page 42 of the Report.
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 has publicly disclosed its water consumption in the HAI Group's Sustainability Report 2025, page 41: https://www.hai-aluminium.com/en/download-center The Entity has assessed water-related risks in watersheds in its Area of Influence. The Entity has demonstrated that these risks are not Material.
7.2a-e Water Management	Not applicable	This Criterion is not applicable to the Entity. As reported in the HAI Group's Sustainability Report 2025, the Entity consumed approximately 6,500 cubic metres (m^3) in that reporting period. The Entity has conducted a water assessment regarding risk to the watersheds and demonstrated the risks are not Material. This assessment was conducted as part of its Environmental Impact Assessment within the framework of its Environmental Management System, which is certified against ISO 14001 by an accredited certification body.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	External experts have conducted a Biodiversity assessment which assessed the impact of the Entity's operations on the local environment for Biodiversity and Ecosystem Services as very low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as based on the assessment performed by an external specialised service provider, the Entity's impact on Biodiversity and Ecosystem Services are rated as low. It was observed during the Audit that the Entity's impact on Ecosystem Services in its Area of Influence would unlikely be Material.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as based on the assessment performed by an external specialised service provider, the Entity's impact on Biodiversity and Ecosystem Services are rated as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services were identified in the recent Biodiversity and Ecosystem Services assessment.
8.4 Alien Species	Conformance	During the Entity's processing of Aluminium, all potential pest species and pathogens are destroyed. Relevant remaining risks identified by the Entity are from the wooden pallets, which are used for shipping over longer distances they are treated according to the International Standards for Phytosanitary Measures No. 15 (ISPM 15) to eliminate that risk. Invasive plants present on the Entity's premises (e.g. Japanese Knotweed) are removed when detected.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not operate, plan to explore or develop New Projects in or close to World Heritage Properties. The Entity's production site is located in Soest, Germany which is a long-established industrial zone.
8.6a-d Protected Areas	Conformance	A Biodiversity and Ecosystem Services assessment undertaken in January 2024 confirmed the presence of Protected Areas near the site. The assessment concluded however that the Entity has no or only low impact on local Biodiversity in these Protected Areas and did not advise any Biodiversity actions are necessary. Therefore, a management plan to ensure that the Entity's activities and Facilities do not adversely impact the integrity of the special values for the Areas is not required.
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's Code of Conduct includes a commitment to support and respect Human Rights as defined by the UN Human Rights Conventions. The Code is available at: https://www.hai-aluminium.com/en/download-center

CRITERION	RATING	COMMENT
		The Entity has conducted a comprehensive documented gender-sensitive Human Rights Due Diligence assessment. The assessment confirmed no salient adverse issues relating to Human Rights.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented policies and processes that conform to gender equity and women's empowerment requirements. Interviews and document reviews undertaken during the Audit confirm there is no indication of deliberate Discrimination against women. The HAI Group publicly reports its performance against gender diversity indicators, including the number/ratio of female/male Workers in its Sustainability Report 2025, pages 60-68, available at: https://www.hai-aluminium.com/en/download-center
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 where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
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 where the Entity operates.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has completed an assessment for the presence of sacred or cultural heritage sites and values within their Area of Influence, however none have been identified. Additionally, Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Additionally, Indigenous Peoples or their lands, territories and resources are not present where the Entity operates.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has not required people to resettle or to be displaced. The Entity's senior management confirmed there are no future plans for New Projects or Major Changes that would require resettlements.
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as the outcome of the stakeholder assessment has confirmed that there are no salient issues with Local Communities and therefore no direct actions are required.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has implemented processes to ensure risk-based Due Diligence over its Aluminium supply chain. Management regularly conducts documented risk assessments. The latest assessment

CRITERION	RATING	COMMENT
		confirmed that the Entity is not sourcing from Conflict-Affected and High-Risk Areas (CAHRAs).
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a suite of standards for its supply chain, which clearly define the rules and expectations for suppliers, contractors, and other relevant business stakeholders. The Entity has also implemented a supplier evaluation and selection process based on a documented risk rating.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a basic strategy to respond to identified risks in their supply chain. As a final stage in the process, if any identified risks are considered significant, the Entity may terminate business activities with the supplier. No such case has occurred since the previous ASI Audit.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit addresses this requirement of the Standard.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The HAI Group has implemented a supply chain Due Diligence process and has publicly reported on this process in its Sustainability Report 2025, page 50: https://www.hai-aluminium.com/en/download-center In the report it is stated that 'During the reporting period, no human rights violations or increased risks were identified in our supply chain'.
9.9 Security practice	Conformance	The Entity does not use armed security forces. Security personnel on site are used primarily as gatekeepers. A Human Rights risk assessment found no relevant risks related to on-site security practices. Worker interviews undertaken during the Audit confirmed no known Human Rights incidents resulting from security services.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity supports labour rights as defined by the International Labour Organization (ILO). Refer to the Entity's Code of Conduct and Corporate Social Responsibility Policy: https://www.hai-aluminium.com/en/download-center The Entity is committed to respecting the Freedom of Association and the Right to Collective Bargaining of all employees within the framework of applicable national laws and regulations. Freely elected Worker representatives are in place. Worker representatives confirmed during the Audit that the Entity respects the rights of Workers to collective bargaining. Collective bargaining agreements are negotiated at both the industry level and site level.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as the right to Freedom of Association and Collective Bargaining is not restricted in Germany where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity neither use nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest person was an apprentice who was 19 years old. Younger Workers receive vocational training which is regulated via official training plans. An

CRITERION	RATING	COMMENT
		internally qualified instructor ensures that the work of the apprentices is not exploitive, hazardous or interfering with schooling and apprenticeship programs. The Entity has robust practices to ensure that under-age persons are not employed.
10.3a-c Forced Labour	Conformance	Through the Audit site tour and interviews undertaken with Workers and management, as well as via document review, there were no apparent cases of Forced Labour identified at the Entity. The risk of Forced Labour has been assessed in the HAI Group's Human Rights Due Diligence. HAI Group has issued a publicly available Modern Slavery Statement, which is accessible at: https://www.hai-aluminium.com/en/download-center
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct, available at: https://www.hai-aluminium.com/en/download-center The Entity does not engage in, nor 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 during the Audit through interviews and document review. All Workers receive diversity and anti-Discrimination training.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment. Weekly meetings are held between human resources department and the Works Council and between the plant manager and the Works Council. Additionally, there are quarterly meetings, Health and Safety committee meetings, and two 'town hall' meetings held annually.
10.6a-g Violence and Harassment	Conformance	As confirmed via interviews and document review, the Entity neither engages 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. For further information, refer to the HAI Group Corporate Social Responsibility Policy: https://www.hai-aluminium.com/en/download-center
10.7a-c Remuneration	Conformance	All Workers are provided with a written contract at the commencement of their employment. The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. Wages paid by the Entity are above the living wage and in accordance with national industry standards. Overtime is paid with a premium of at least an additional 25%.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is incorporated into the Collective Bargaining Agreement and all employment contracts.

CRITERION	RATING	COMMENT
		Worker interviews undertaken during the Audit confirmed that Overtime is voluntary.
10.9a-b Informing Workers of Rights	Conformance	As confirmed by interviews with Workers and Human Resources management during the Audit, the Entity's Workers are informed on Human and Labour Rights during the onboarding process. All Workers receive documented training on fundamental documents such as the HAI Group's Code of Conduct and Corporate Social Responsibility policy. Labour laws that require notice (i.e. physical posting on site) are accessible via both the HAI intranet and an app on the employee's mobile phones.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has an Occupational Health and Safety (OH&S) Management System which is ISO 45001:2018 certified. The Entity has implemented and communicated its Environmental, Energy, Health and Safety Management Policy. Both the ISO Certificate and the Policy are publicly available at: https://www.hai-aluminium.com/en/download-center
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented an OH&S Management System which is ISO 45001:2018 certified. The system's effectiveness is reviewed annually. The Entity has defined and is monitoring OH&S related leading and lagging performance indicators. Performance against these indicators is disclosed in the HAI Group's Sustainability Report 2025 (pages 96-98). The Report is available at: https://www.hai-aluminium.com/en/download-center
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented a joint Health and Safety Committee, by which Workers can raise, discuss and participate in the resolution of OH&S issues with management. Agendas and meeting minutes were presented during the Audit.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 August 2024	Initial Certification Audit – Provisional Certification
1	17 January 2025	Revised design for Provisional certificates (page 1)
2	6 June 2025	Surveillance Audit – Full Certification Correction to the supply chain activities associated with the Initial Certification Audit
3	20 September 2026	Surveillance Audit