ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Stockach Aluminium GmbH

CERTIFICATE NUMBER
69

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
GUTCERT (AFNOR GROUP)

DATE OF ISSUE
31 JANUARY 2024

DATE OF EXPIRY
30 JANUARY 2027

CERTIFIED SINCE
31 JANUARY 2020

AUTHORISED BY



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

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

CERTIFICATION SCOPE

Stockach Aluminium remelt and casthouse operations in Germany.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	AS Oxidwerke GmbH
ENTITY NAME	Stockach Aluminium GmbH
CERTIFICATION SCOPE	Stockach Aluminium remelt and casthouse operations in Germany.
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (8 – 9 October 2019) • Surveillance Audit (23 July – 24 September 2020) • Surveillance Audit (26 April 2022) • Re-Certification and Scope Change Audit (25 September - 7 December 2023) • Surveillance Audit (3 July 2025)
AUDIT FIRM	GUTCert (AFNOR Group)
AUDIT DATE	• 8 – 9 October 2019 (Initial Certification Audit) • 23 July – 24 September 2020 (Surveillance Audit) • 26 April 2022 (Surveillance Audit) • 25 September – 7 December 2023 (Re-Certification and Scope Change Audit) • 3 July 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 17 December 2019 (Initial Certification Audit) • 10 September 2020 (Surveillance Audit) • 19 August 2022 (Surveillance Audit) • 9 January 2024 (Re-Certification and Scope Change Audit) • 17 June 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (8 – 9 October 2019) The Entity melts aluminium into ingots. It has the capacity to melt various alloys as well as secondary aluminium with high impurities but also primary aluminium. The Entity has only one site, in Stockach, Germany. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (23 July – 24 September 2020)

	The Entity melts aluminium into ingots. It has the capacity to melt various alloys as well as secondary aluminium with high impurities but also primary aluminium. The Entity has only one site, in Stockach, Germany. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (26 April 2022)</u> The Audit Scope included the remelt and casting operations at Stockach Aluminium. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses Criteria in the ASI Performance Standard that were identified as non-conformities from the previous Surveillance Audit were included in the Audit Scope. The Audit was undertaken as a 'desktop' exercise, consistent with the Entity's overall maturity level and the audit type. <u>Re-Certification and Scope Change Audit (25 September – 7 December 2023)</u> The Audit Scope included the remelt and casting operations at Stockach Aluminium. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (3 July 2025)</u> The Audit Scope included the remelt and casting operations at Stockach Aluminium. Supply chain activities included in the Audit Scope: • Aluminium Re-melting/Refining • Casthouses Those Criteria identified as current open non-conformances from the previous ASI Performance Standard Audit 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	31 January 2024 – 30 January 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	30 January 2027

CERTIFICATE NUMBER	69



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

Stockach Aluminium GmbH (the Entity) is an Aluminium smelter that is 100% owned by BAGR Berliner Aluminiumwerk GmbH, located in southern Germany and currently employs approximately 120 employees. The Entity is focused on the production of rolling ingots from Scrap remelting. The current production capacity is approximately 70,000 tonnes per annum of rolled bars and sows. Current Scrap usage is approximately 90,000 tonnes per annum. The Entity produces rolled ingots of alloy groups 1xxx, 3xxx, 4xxx, 5xxx, 6xxx, 7xxx and 8xxx across many formats from between 378 mm to 1,100 mm thick and 960 to 2,070 mm wide. The Entity also offers remelting of Aluminium Dross and metal scrap into Aluminium sows and has a flexible production setup consisting of two continuous casting plants, two hearth melting and casting furnaces, one holding and casting furnace and five rotary drum or tilting drum kilns.

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	Low	Medium	Low	Low
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 (including a legal register) that allow adequate awareness of legal requirements and ensure Compliance with Applicable Laws and regulations. Legal developments are systematically monitored, and competent legal advice is available. The Entity's management confirmed that there were no legal disputes or violations in the previous certification period.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms. The Entity has a system in place against Corruption adequate to the size and nature of its business. Among the instruments, there is a Code of Conduct that addresses business ethics, which has been issued and communicated internally and externally. Employees have been trained on the Code. The financial system is periodically audited by an external tax auditor. The Business Ethics Code is available at: https://www.stockachalu.de/service-kontakt/downloads
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct and a Supplier Code of Conduct including principles relevant to environmental, social and governance performance. These documents are available at: https://www.stockachalu.de/service-kontakt/downloads
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued its Environment, Health & Safety Policy. Human and Labour rights are addressed in its Code of Conduct. These documents have been adequately communicated internally (intranet, postings) and on the Entity's website: https://www.stockachalu.de/service-kontakt/downloads These Policies are endorsed by senior management and are periodically reviewed. Responsibilities are defined and adequate resources are provided. Employee training has also been demonstrated.
2.2a-c Leadership	Conformance	One of the Entity's Managing Directors and the Quality & Environment Manager together have the overall responsibility and authority to ensure conformance with the ASI Performance Standard with adequate, resources provided.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established and maintains an integrated and documented Management System, which addresses all three facets (Environment, Social and Governance). The Entity is certified against ISO 50001. Responsibilities are assigned, objectives are defined, and the performance is regularly reported.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and maintains an integrated and documented Management System, which addresses all three facets (Environment, Social and Governance). Responsibilities are assigned, objectives are defined, and the performance is regularly reported. The Entity has defined its Social Management System in an adequate

CRITERION	RATING	COMMENT
		process description, which is adequate to the size and nature of the business. Implementation was demonstrated throughout the Audit.
2.4a-e Responsible Sourcing	Conformance	The Entity has established and communicated its Responsible Sourcing Policy and its Supplier Code of Conduct, addressing environmental, social and governance issues, available at: https://www.stockachalu.de/service-kontakt/downloads The Entity has established documented processes for risk assessments, supplier selection and evaluation to implement these Policies.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred since joining ASI. The latest major project (new chimney, filters and new furnace) was undertaken from 2018-2020. The project started before joining ASI in December 2018. The Entity has developed and implemented systems and processes to conduct Impact Assessments for New Projects or Major Changes to the existing Facility.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have occurred since joining ASI. The latest major project (new chimney, filters and new furnace) was undertaken from 2018-2020. The project was started before joining ASI in December 2018. The Entity has developed and implemented systems and processes to conduct Impact Assessments for New Projects or Major Changes to the existing facility. There was no concern about the negative social effects caused by that project. The nature of the project did not require a social or Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	As confirmed through document review, interviews and a site tour, the Entity has site specific Emergency Response Plans in place. They were developed in collaboration with relevant Stakeholders (e.g. fire brigade) and are communicated internally. The plans comprise preventive and corrective measures. Relevant Stakeholders (e.g. authorities) can access the Emergency Response Plans on request.
2.8a-d Suspended Operations	Conformance	The Entity has assessed the risks and impacts of emergencies, including suspended operations. A documented plan to manage emergencies, including disasters has been established and regularly reviewed.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has defined responsibilities and set rules to ensure that in the event of a merger or acquisition, all legal and ASI requirements will be met. The site is located within an industrial area, active for decades.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has defined responsibilities and rules to ensure all legal and ASI requirements will be met in the event of closure, decommissioning or divestment. The site is located within an industrial area that has been active for decades with no mining activities.
3. TRANSPARENCY		

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	The Entity publishes a Sustainability Report on an annual basis. The latest report is available at: https://as-oxid.net/download/ Related Environmental, Social and Governance (ESG) documentation is also accessible at this location, including policy statements, the Entity's anti-Slavery statement, Environment, Health and Safety (EHS) policy, and other environmental data.
3.2 Non-compliance and Liabilities	Conformance	The Entity has issued a publicly available sustainability report, which contains a statement on non-compliance & liabilities, in which senior management confirmed during the Audit that there were no Material fines, penalties or sanctions issued in the previous three years. Refer to the Entity's Sustainability Report on page 34, available at: https://www.stockachalu.de/service-kontakt/downloads
3.3a-c Payments to Governments	Conformance	The Entity has developed and implemented systems and processes including a Code of Conduct, training, risk assessments and periodic financial audits that conform to anti-Corruption requirements related to payments to governments and the facilitation of payments. A statement on payments to Governments is available in the Entity's Sustainability Report on page 33, available at: https://www.stockachalu.de/service-kontakt/downloads
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established an accessible Complaints Resolution Mechanism, adequate to the size and nature of its business. All Stakeholders and Rightsholders can direct requests or concerns via mail, email, or phone: https://www.stockachalu.de/service-kontakt/service-kontakt
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity produces Aluminium ingots, sows and T-bars from remolten scrap and has evaluated its cradle-to-gate life cycle impact, using data from the European Aluminium Association (EAA) Report 2018. The Life Cycle Assessment (LCA) is publicly available at: https://www.stockachalu.de/service-kontakt/downloads
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	There has been no request received to date from customers on LCA. The Entity has publicly communicated its LCA information in the 'LCA Stockach' document, available at: https://www.stockachalu.de/service-kontakt/downloads
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise the generation of scrap. More than 97% of all generated waste is recycled, waste data is available at: https://www.stockachalu.de/service-kontakt/downloads (see "Abfallstatistik"). When Scrap is generated, the site collects 100% of Scrap for recycling and thoroughly separates alloys as the Entity's core activity is the recycling of external scraps.
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity supports programs to increase recycling rates in Germany through its active membership in the German General Association of the Aluminium Industry (Gesamtverband der Aluminiumindustrie e.V. (GDA,)).
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has publicly disclosed its Greenhouse Gas (GHG) emissions and its energy use by source in its annual Sustainability Report on pages 23, 25 and 26, available at: https://www.stockachalu.de/service-kontakt/downloads The Entity's energy and GHG data have been independently verified. Publicly available GHG emissions data however do not include any Scope 3 emission data.
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 its GHG emissions reduction targets, plan and reduction pathway, which is available at: https://as-oxid.net/download/ The Entity's energy management system is certified against ISO 50001. The Entity publicly provides data for Scopes 1 and 2 only, as it does not purchase Primary Aluminium. Note that whilst approximately six percent of the product is derived from Primary Aluminium, this quantity is provided by customers, and the Entity currently has no influence as to where customers source this metal from. Additionally, the Entity recycles its Dross and has applied the 'cut-off' approach.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	The Entity has publicly disclosed its GHG emissions targets, plan and pathway, developed using the ASI endorsed methodology, refer to: https://as-oxid.net/download/ The Entity's energy management system is certified against ISO 50001. The Entity publicly provides data for scopes 1 and 2 only, as it does not purchase Primary Aluminium. Nevertheless, Scope 3 emissions data and associated targets specific to these emissions, are not currently publicly disclosed.
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy Management System according to ISO 50001 and a process and controls to achieve performance aligned to the GHG Emissions Reduction Plan and targets jointly developed with its sister company AS Oxidwerke.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity measures its Emissions to Air and reports to the local environment authority on an annual basis. The Entity has plans to

CRITERION	RATING	COMMENT
		minimise its adverse impacts and reported it in its Sustainability Report, pages 27 and 28: https://www.stockachalu.de/service-kontakt/downloads
6.2a-g Discharges to Water	Conformance	The Entity regularly measures the quality of its raw and wastewater and reports the data to the local water authority on an annual basis. The Entity's data and plans to minimise its adverse impacts are publicly available in its annual Sustainability Report, page 22: https://www.stockachalu.de/service-kontakt/downloads
6.3a-g Assessment and Management of Spills and Leakages	Conformance	As confirmed through document review, interviews and a site tour, the Entity has conducted risk assessments and implemented prevention measures for Material Leakages (to air, water and soils). In its Sustainability Report, the Entity confirmed that in the reporting period, there were no Spills, Leakages or similar incidents, page 22: https://www.stockachalu.de/service-kontakt/downloads
6.4a-b Public Disclosure of Spills and Leakages	Conformance	In its publicly available Sustainability Report, the Entity confirmed that there were no Spills, Leakages or similar incidents in the reporting period.
6.5a-c Waste Management and Reporting	Conformance	The Entity has managed its waste in accordance with the Waste Mitigation Hierarchy. The Entity has publicly disclosed its annual waste quantities in its 2023 Sustainability 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 tracks its water usage and publicly reports its use in its Sustainability Report, page 22: https://www.stockachalu.de/service-kontakt/downloads The Entity has assessed its water-related risks in Watersheds in the Entity's Area of Influence as confirmed by document review, interviews and a site tour. The Area of Influence only includes the facility ground, a groundwater source, the neighbouring stream and the neighbouring company's ground.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as all assessed risks to Watersheds are low. However, the Entity has implemented preventive measures to reduce consumption and pollution. Most of its process water is recycled on site within a closed loop.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity engaged a biologist to conduct a Biodiversity Impact Assessment. The assessment identified areas on site relevant to Biodiversity and assessed Ecosystem Services. At the time of the Audit,

CRITERION	RATING	COMMENT
		the assessment was still recent, and the measures suggested by the author were still being evaluated by the Entity.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's previous assessment completed in September 2023, rated their impact on biodiversity as low. Ecosystem Services were addressed in the assessment, and no Priority Ecosystem Services were identified. The Entity is situated within a 100-year-old industrial area.
8.2a-g Biodiversity Management	Conformance	The Entity has assessed risks on Biodiversity in its Area of Influence, with the last assessment completed in late 2023. Whilst the previous assessment rated the Biodiversity impact as low, the more recent study contains suggestions for improvement actions. The Entity has developed a Biodiversity management plan, supported by a qualified specialist.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the recent Biodiversity and Ecosystem Services Assessment did not identify any priority Ecosystem Services.
8.4 Alien Species	Conformance	Alien Species may be spread hiding in Dross, scrap metal and vehicles. All Dross and metal received are remelted in a furnace which ensures that all organic material is destroyed. A potential risk is through the use of wooden pallets. All pallets are sourced locally and shipments to customers are only to neighbouring countries in Europe where the risk is quite limited.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that it is not operating in or near a Protected Area or world heritage site. See Sustainability Report 2022, page 31: https://www.stockachalu.de/service-kontakt/downloads
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable, as the Entity is located in an industrial zone, which has been in operation for approximately 100 years. There are no Protected Areas within the direct vicinity of the Entity, the nearest Protected Area is approximately eight kilometres away. The 2023 Sustainability Report (page 31) confirmed that it is not operating in or near a Protected Area.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights. The Code can be accessed at: https://www.stockachalu.de/service-kontakt/downloads The Entity has conducted a documented Human Rights Due Diligence assessment. Interviews with Stakeholders and management confirm there are currently no salient issues with regard to Human Rights and the Entity's Human Rights assessment did not identify any salient adverse Human Rights impacts present at the audited site.

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	Human Rights are addressed in the Entity's Code of Conduct (including Discrimination and Harassment) and a documented program to foster gender equity and women's empowerment has been established and the Entity is working on its implementation. The Entity's Sustainability Report (on pages 18 and 32) provides an overview of how gender equity is being managed, including employee gender data and a commitment to increase the share of women employed at the Entity.
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 directly affected by the Entity's operations
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 directly affected by the Entity's operations
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 directly affected by the Entity's operations. The Entity is located in southern Germany.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. There are no cultural and sacred heritage sites in the vicinity of the Entity as it located in an industrial area.
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 directly affected by the Entity's operations The Entity has assessed the presence of cultural and sacred heritage in their vicinity but did not identify any. The Entity has no Major Changes or New Projects planned or ongoing.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, there are no previous or plans for resettlements or displacements.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects the legal and customary rights and interests of Local Communities. An interview with the local authority and the results of the Human Rights Due Diligence assessment confirmed there are currently no salient issues with regard to Human Rights. Therefore, there is no need for action, the Entity actively cooperates with the community of Stockach.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Suppliers are obliged to comply with the Entity's Responsible Sourcing Policy, where they must not be active in conflict areas or at least not contribute to escalation and Human Rights violations through its business activities. Responsibilities and resources are defined, information gathering, and supplier engagement have been demonstrated during the audit.

CRITERION	RATING	COMMENT
		Responsible Sourcing Policy: https://www.stockachalu.de/service-kontakt/downloads.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has processes and procedures for its supply chain in place, which clearly define rules and expectations for suppliers, contractors, and others with whom the Entity does business. The Entity has implemented a supplier evaluation and selection process based on a documented procedure. As confirmed by document review, at the time of the Audit, Aluminium was not sourced from a Conflict-Affected or High-Risk Area.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a strategy to respond to identified risks in their supply chain. The Entity's management confirmed at the time of the audit, that they were not sourcing any metal from a Conflict-Affected or High-Risk Area.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Re-Certification Audit includes the Entity's Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has reported on its supply chain Due Diligence assessment results in its Sustainability Report on page 16, available at: https://www.stockachalu.de/service-kontakt/downloads The provided information is however deficient as it does not disclose identified significant risks or any violations or action(s) taken.
9.9 Security practice	Not Applicable	This Criterion is not applicable, as the Entity does not employ any security forces.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to unite freely in the unions, seek representation and join the Works Council without interference. The Entity's Code of Conduct confirms the right of Freedom of Association, page 4: https://www.stockachalu.de/service-kontakt/downloads A freely elected Worker representation (Works Council) is in place. The Entity does respect the right of Collective Bargaining. It adheres to the Collective Bargaining Agreement (CBA) negotiated on site level. However, the Entity is not a member of the employers' Collective Bargaining community which negotiates on a branch level with the Union.
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 the country where the Entity operates.
10.2a Child Labour	Conformance	As confirmed by interviews and document review, the Entity does neither use nor support the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are employed for educational purposes only. If at all, work with hazardous substances happens only under supervision and as part of vocational education.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	As confirmed by interviews and document review the Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking, either directly or through any employment or recruitment agencies. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, either directly or through employment or recruitment agencies. The Entity does not require Migrant Workers to lodge deposits or security payments, either directly or through employment or recruitment agencies, as confirmed by interviews and document review. A Modern Slavery Statement is available at: https://www.stockachalu.de/service-kontakt/downloads
10.4a-c Non-Discrimination	Conformance	As confirmed by interviews and document review, the Entity 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. Employees receive diversity and anti-Discrimination training.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, Harassment, and gender-based violence including sexual Harassment, or verbal abuse of Workers. The Entity has prohibited Violence and Harassment in its Code of Conduct (Verhaltenscodex): https://www.stockachalu.de/service-kontakt/downloads
10.7a-c Remuneration	Conformance	The Entity does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and worker interviews. Working Time, payment and leave are negotiated in CBAs. The wages paid are substantially above the legal minimum and are in line with the industry standard. Verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented.
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 part of each employment contract. A clocking-in system is in place and records are accessible.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that Workers are informed on their rights as labourers. They are informed via several channels, including face-to-face explanations, posted labour law and training.
11. OCCUPATIONAL HEALTH AND SAFETY		

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System and has published its Policy for environment, safety and health, available at: https://www.stockachalu.de/service-kontakt/downloads Data on the performance of Environment, health and safety management are provided in the Entity's Sustainability Report, available at: https://www.stockachalu.de/service-kontakt/downloads/ The Entity has not however demonstrated that the OH&S Management System has been internally or externally reviewed.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The effectiveness of the OH&S Management System is annually reviewed by senior management. OH&S performance indicators are made available in the Entity's annual Sustainability Report, pages 17-20: https://www.stockachalu.de/service-kontakt/download
11.2 Employee engagement on Health and Safety	Conformance	Employees are involved in OH&S topics every quarter through the OH&S committee and cooperation with the Works Council. The Works Council is responsible for advocating and supporting employees' rights through an established dialogue with management which includes topics on health and safety.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 January 2020	Initial Certification Audit – Full Certification
1	1 October 2020	Surveillance Audit
2	1 September 2022	Surveillance Audit - Certification Scope wording revised to align with the Entity's ASI Chain of Custody Standard Certification; Revised wording for the Certification Audit to include 'Initial'; Updated the Audit Type field to include history of audit types.
3	31 January 2024	Re-Certification and Scope Change Audit from ASI Performance Standard V2 to V3.
4	13 November 2026	Surveillance Audit