

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hammerer Aluminium Industries GmbH

CERTIFICATE NUMBER
76

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
TÜV RHEINLAND
CERT GMBH

DATE OF ISSUE
24 FEBRUARY 2023

DATE OF EXPIRY
23 FEBRUARY 2026

CERTIFIED SINCE
24 FEBRUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

The production of extrusion billets
and rolling ingots from recycled
aluminium scrap at Hammerer
Aluminium Industries GmbH
(Austria).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries GmbH
CERTIFICATION SCOPE	The production of extrusion billets and rolling ingots from recycled aluminium scrap at Hammerer Aluminium Industries GmbH (Austria).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (3 – 4 December 2019)Surveillance Audit (12 January – 25 February 2022)Re-Certification Audit and Scope Change (14 – 16 February 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">3 – 4 December 2019 (Initial Certification Audit)12 January – 25 February 2022 (Surveillance Audit)14 – 16 February 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 February 2020 (Initial Certification Audit)9 June 2022 (Surveillance Audit)29 March 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (3 – 4 December 2019)</u> The production of extrusion billets and rolling ingots from recycled aluminium scrap.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (12 January – 25 February 2022)</u> The production of extrusion billets and rolling ingots from recycled aluminium scrap.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>Criteria in the ASI Performance Standards that were identified as non-conformities from the previous Initial Certification Audit were included in the audit scope.</p>

Re-Certification Audit (14 – 16 February 2023)

The audit scope included the production of extrusion billets and rolling ingots from recycled aluminium scrap.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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

24 February 2023 – 23 February 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

23 August 2024

CERTIFICATE NUMBER

76



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 HAI Group, headquartered in Ranshofen/Braunau (Upper Austria) produces complete aluminium solutions (profiles and processed products) for the construction, transport, electrical and mechanical engineering and plant engineering sectors. Hammerer Aluminium Industries (HAI) has existed in this form since 2007 and has achieved extremely rapid, dynamic and at the same time healthy growth in recent years.

In the 15 years since the company was founded, it has expanded from one to eight locations in four countries, the annual tonnage processed has increased to 250,000 tonnes, more than tripling, the turnover has multiplied from 110 million euros to 990 million in 2022 and the team has expanded from 350 to around 2,000 employees. A joint venture with a Korean industrial company is being implemented for 2023.

HAI offers innovative solutions made of aluminium and covers the entire value chain – from recycled input material to sophisticated profiles and complex components – taking into account all sustainability aspects. And as such, relies on state-of-the-art production facilities, and comprehensive research and development, especially with regard to new alloys.

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

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures, and processes that conform to the ASI Performance Standard legal compliance requirements. Systems are implemented (e.g. a legal database) to maintain awareness of, and ensure compliance with Applicable Law. The Entity holds valid ISO 14001 and ISO 45001 certificates:</p> <p>https://www.hai-aluminium.com/downloads</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms and has implemented a Code of Conduct which is communicated internally and externally:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>The Entity has provided training to employees with regard to business ethics. The HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially:</p> <p>https://app.whistlecomplete.at/whistleblowing/e5308b0d-82a4-4018-b3a7-0c924b92c852</p> <p>The financial system is periodically audited by an external tax auditor.</p>
1.3a-e Code of Conduct	Conformance	<p>The HAI Group's Code of Conduct has been issued and communicated internally and externally:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>The Entity has provided training to employees with regard to business ethics. The HAI Group operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has issued and published its Corporate Social Responsibility Policy and Environmental, Energy, Health and Safety Policy, available at:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>The Entity has also issued and communicated its Codes of Conduct for employees and suppliers.</p>
2.2a-c Leadership	Conformance	<p>The Entity's Chief Operating Officer has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard and providing sufficient resources to support its implementation. Responsibilities are reflected in the organisational chart.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015.</p> <p>https://www.hai-aluminium.com/downloads</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has documented and implemented an Occupational Health and Safety (OHS) Management System according to ISO 45001. Risks and issues relating to Human and Labour Rights are also systematically managed.</p> <p>The HAI Group has received the kununu Top Company 2023, Austria Top Employer 2023 and Best Recruiters 2022/23 award.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented and made public their sourcing policy. Refer to the Code of Conduct for Suppliers:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>The Entity's sourcing process is documented and regular Due Diligence and supplier evaluations are undertaken.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is currently not applicable to the Entity as there have been no New Projects or Major Changes to the existing site since the previous audit and none are planned.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is currently not applicable to the Entity as there have been no New Projects or Major Changes to the existing site since the previous audit and none are planned.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented a site-specific emergency response plan. The plan was developed in collaboration with relevant Stakeholders including the neighbouring industrial facility and relevant authorities. The Entity holds valid ISO 14001 and ISO 45001 certificates.</p> <p>The premises is situated within a large industrial zone, and the owner provides emergency services (fire brigade). The owner is also certified against the ASI Performance Standard.</p>
2.8a-d Suspended Operations	Conformance	<p>As confirmed by document review and interviews, the Entity has incorporated business resilience into its planning for abnormal situations. Business continuity planning is subject to regular review.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity's management confirmed that it has not undergone or planned a merger or acquisition (M&A) since it joined ASI.</p> <p>However, the HAI Group has a documented process to manage M&As, should it become relevant.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a procedure for closure, decommissioning and divestment. There have been no such events since 2010.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has disclosed its governance approach and its Material environmental, social, and economic impacts via the HAI Group's Sustainability Report, which is based on the reporting standard of the Global Reporting Initiative (GRI):</p> <p>https://www.hai-aluminium.com/downloads</p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	<p>Information on significant fines, judgments, penalties, and non-monetary sanctions is included in the Sustainability Report 2021, page 33, available at:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>According to this report, and as has been witnessed by HAI management, no significant fines, judgments, penalties and non-monetary sanctions have been enforced.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has developed and implemented policies, systems, procedures, and processes that conform to anti-Corruption requirements related to payments to governments and the facilitation of payments. The Codes of Conduct for both employees and suppliers are available at:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>According to the 2021 financial audit report, the Entity did not make government payments other than taxes, fees, and social insurance. All payments are subject to an annual external financial audit.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>Stakeholders are made aware of the contact details of the legal counsel in the Entity's Code of Conduct. Stakeholders are encouraged in the Sustainability Report 2021 to raise their concern and a dedicated email address has been established:</p> <p>ethics@hai-aluminium.com.</p> <p>Management confirmed that until the time of the audit, no complaints had been raised via this mechanism.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the life cycle impacts of its major Products in a Life Cycle Assessment (LCA), which meets ISO 14040 and ISO 14044 requirements. The study was undertaken by a specialised external institute. The study has not been made publicly available, however the Entity provides LCA information upon request.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Not Applicable	<p>The Entity confirmed that it will provide adequate cradle-to-gate LCA information upon customer request.</p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>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. The waste balance is reported in the Sustainability Report 2021, page 23:</p> <p>https://www.hai-aluminium.com/downloads</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	As a remelter, the Entity works closely with scrap collectors to foster the recycling of Aluminium.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has disclosed its Greenhouse Gas (GHG) Emissions and energy use by source in its Sustainability Report 2021, pages 29-30: https://www.hai-aluminium.com/downloads</p> <p>The data has been verified by the Entity's Chief Operating Officer prior to publication, who was not involved in the data acquisition and analysis. However, the data has not been verified by a competent third party verifier, independent of the Member.</p> <p>Corrective action has been already initiated.</p>
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-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established its GHG Emissions Reduction Plan and made publicly available its GHG Emissions Reduction Pathway in its Sustainability Report 2021.</p> <p>However, only the target (25% reduction by 2025 from baseline 2019) is stated in the Sustainability Report 2021. The pathway did not go beyond 2025.</p> <p>The HAI Group decarbonisation plan consistent with a 1.5°C warming scenario will be developed and published within the next sustainability report (2022), due for publication some weeks after the time of the audit.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity demonstrated that a system and processes are in place to implement its GHG reduction targets.</p> <p>The GHG Management System is integrated in the Entity's Environmental Management System, which is certified against ISO 14001.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>Air emission data are collected and reported in the annual Sustainability Report 2021, page 30: https://www.hai-aluminium.com/downloads</p> <p>The Entity is committed to using the Best Available Technology (BAT) to reduce Emissions to Air. In 2020, a new air filtering system representing BAT was installed. Therefore, currently there is no need for an emission minimisation plan.</p>

CRITERION	RATING	COMMENT
		However, the Entity's Sustainability Report 2021 does not disclose this information.
6.2a-g Discharges to Water	Conformance	The Entity does not directly discharge effluents to water (e.g., creeks or rivers). Instead, effluents are treated in a neighbouring facility's industrial wastewater treatment plant. The Entity has disclosed its Discharges to Water in the Sustainability Report 2021, page 32: https://www.hai-aluminium.com/downloads
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Within the scope of its certified Environmental Management System according to ISO 14001, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water, or soil. The Entity has established and implemented management and external communication plans, compliance controls and a monitoring programme to prevent and detect Spills and Leakage.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented procedures to ensure the disclosure to affected parties of the volume, type, and potential impact of significant Spills immediately following an incident. As confirmed in the Sustainability Report, there were neither significant Spills nor Leakages in 2021: https://www.hai-aluminium.com/downloads
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a waste management strategy in line with its ISO 14001 certification. Several types of scrap and waste (such as Hazardous Waste, recyclable waste, Aluminium, and Dross) are segregated and disposed of or treated in accordance with local law. Impacts to human wellbeing and the environment of the waste have been assessed in an environmental impact analysis as part of the Environmental Management System according to ISO 14001.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity has maximised the recovery of Aluminium through the treatment of Dross. 100% of the Dross is sent to a neighbouring industrial facility for recovery of the Aluminium. Dross is stored within a covered area.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has implemented a system to identify and map its water withdrawal by use, source and by type. Water is supplied by and discharged to a neighbouring industrial facility. The Sustainability Report 2021 (page 32) discloses water use.
7.2a-e Water Management	Not Applicable	This Criterion is currently not applicable to the Entity, as the water risk assessment did not identify any Material risks related to Watersheds.

CRITERION	RATING	COMMENT
8 BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	On request of the Entity, a biodiversity assessment has been conducted by external experts. The impact of the Entity's operations to the local environment was assessed as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable as the biodiversity assessment determined the Entity's impact as low. There was no observation made during the audit that the Entity's impact on Ecosystem Services in its Area of Influence would be material.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as, the biodiversity assessment determined the Entity's impact as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as no Priority Ecosystem Services were identified. The Entity's production site is located within an industrial park surrounded by other facilities related to the production and processing of Aluminium.
8.4 Alien Species	Conformance	During the Entity's thermal processing of Aluminium scrap, all species are destroyed. Relevant remaining risks identified by the Entity are from the wooden pallets, which are all treated according to the International Standards for Phytosanitary Measures No. 15 (ISPM 15) to eliminate that risk.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not operate or plan to explore or develop New Projects in or close to World Heritage Properties. The Entity's production site is located in Ranshofen, Austria in a long-time established industrial zone.
8.6a-d Protected Areas	Conformance	The Entity has identified Protected Areas using the Integrated Biodiversity Assessment Tool (IBAT). There are no Protected Areas within the Entity's Area of Influence and therefore no need for a respective management plan.
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 conducted a documented gender-sensitive Human Rights Due Diligence assessment. The Entity is embedded in the community and society and the assessment confirmed that there are currently no salient adverse issues regarding Human Rights.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented policies and processes that conform to the gender equity and women's empowerment requirements. Interviews and document reviews confirm there is no indication of deliberate discrimination against women. The HAI Group reports publicly on gender diversity indicators such as the number of female/male workers. Further information is available in the Sustainability Report 2021, page 54:

CRITERION	RATING	COMMENT
		https://www.hai-aluminium.com/downloads/
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), 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 of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a-b Cultural and Sacred Heritage	Not Applicable	This Criterion is not applicable as the outcome of the Human Rights Due Diligence assessment confirmed that there are no issues with Local Communities and therefore, no need for action. The Entity is located in a large industrial site which has operated for more than 70 years.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as the outcome of the Human Rights Due Diligence assessment confirmed that there are no issues with Local Communities and therefore, no need for action. The Entity is located in a large industrial site which has operated for more than 70 years.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable as no resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a-h Affected Populations and Organisations	Conformance	This outcome of the Human Rights Due Diligence conducted has confirmed that there are no salient issues with Local Communities (Ranshofen is the nearest, others are Braunau and Neukirchen) and therefore there is no need for action. The Entity is located in Austria, Central Europe, in a large industrial zone, which has operated for more than 70 years.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has demonstrated the implementation of processes to ensure a risk-based Due Diligence over its aluminium supply chain. Management regularly conducts documented risk assessments. The latest assessment confirmed that the Entity is not sourcing from Conflict-Affected or High-Risk Areas.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented standards for its supply chain, which clearly define rules and the expectations for suppliers, contractors, and others with whom they do business. The Entity has 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.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The fact that the Entity was audited against the ASI Performance Standard addresses this Criterion in full.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has a supply chain Due Diligence process in place. However, it has not yet publicly reported about this process and its results.
9.9 Security practice	Conformance	<p>The Entity does not employ security forces. The Entity's human rights risk assessment identified no specific risks related to security practices. Worker interviews confirmed no known Human Rights violations caused by the security service.</p> <p>Security is provided by the neighbouring company, which is certified to the ASI Performance Standard.</p>

10. LABOUR RIGHTS

10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity supports Labour Rights as defined by the International Labour Organization (ILO), refer to the HAI Code of Conduct: https://www.hai-aluminium.com/downloads/</p> <p>The HAI Group 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, as outlined in the HAI Group Corporate Social Responsibility Policy.</p> <p>A freely elected Worker representation process is in place. Worker representatives confirmed that the Entity respects the rights of Workers to Collective Bargaining and collective agreements negotiated at an industry-level and site-level are in place.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as the right to Freedom of Association and Collective Bargaining is not restricted in the country (Austria) where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker was an apprentice who was 15 years old. The Entity has robust practices to ensure that children are not employed.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in nor supports the use of Forced Labour or Human Trafficking either directly or through any employment or

CRITERION	RATING	COMMENT
		<p>recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.</p> <p>However, at the time of the audit, a Modern Slavery Statement was not yet publicly available. The Entity has included it in their next sustainability report (2022), due for publication some weeks after the audit.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct:</p> <p>https://www.hai-aluminium.com/downloads/</p> <p>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. This was confirmed by interviews and document review. Employees receive diversity and anti-discrimination training.</p> <p>The Entity monitors and manages gender related topics to overcome historical inequality of women and men.</p>
10.5 Communication and engagement	Conformance	<p>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.</p>
10.6a-g Violence and Harassment	Conformance	<p>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, refer to the HAI Group Corporate Social Responsibility Policy:</p> <p>https://www.hai-aluminium.com/downloads/</p> <p>A risk assessment to assess potential Violence and Harassment issues has been adopted.</p>
10.7a-d Remuneration	Conformance	<p>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. The wages paid are above the living wage and are in line with the national industry standard.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on working time, public holidays and paid annual leave. Working time is part of the collective bargaining agreement and each employment contract.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>As confirmed by interviews with Workers and Human Resources (HR) management during the audit, the Entity's Workers are informed about human and labour rights during the onboarding process. All Workers receive documented training on fundamental documents such as the Code of Conduct and the HAI Group's Corporate Social Responsibility Policy.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented and communicated its Occupational Health and Safety Policy, available at https://www.hai-aluminium.com/downloads/ The Entity holds a valid ISO 45001 certificate from TÜV Rheinland Cert, accessible via the link above.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The Entity holds a valid ISO 45001 certificate from TÜV Rheinland Cert. This standard requires a periodic review of the OH&S Management System. The Entity has defined and is monitoring OHS-related leading and lagging performance indicators. However, these indicators have not yet been made publicly available.
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 occupational health and safety issues with management. Agendas and meeting minutes are maintained.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 February 2020	Initial Certification Audit – Full Certification
1	25 March 2021	Revised to correct incorrect public headline statements relating to Criteria 9.3, 9.4, 9.5, 9.6a and b.
2	17 August 2021	Surveillance Audit
3	1 June 2023	Re-Certification Audit and Scope Change - Full Certification Scope Change to apply PS V3; Update to remove "Holding" from the Certification Scope to accurately name the Entity.