
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**TRIMET
ALUMINIUM SE
(ESSEN)**

CERTIFICATE
NUMBER

272

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV NORD
CERT GMBH

DATE OF ISSUE

14 APRIL 2023

DATE OF EXPIRY

13 APRIL 2026

CERTIFIED SINCE

14 APRIL 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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

Development, manufacture and sale of alloy in the form of slabs and ingots; production of molten aluminium at the Essen site (Germany).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET Aluminium SE (Essen)
CERTIFICATION SCOPE	Development, manufacture and sale of alloy in the form of slabs and ingots; production of molten aluminium at the TRIMET Aluminium SE Essen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV NORD CERT GmbH
AUDIT DATE	<ul style="list-style-type: none">7 – 11 November 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 March 2023
AUDIT SCOPE	<p>The audit scope includes the development, manufacture and sale of alloy in the form of slabs and ingots and production of molten aluminium at the Essen site.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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

14 April 2023 – 13 April 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

13 April 2026

CERTIFICATE
NUMBER

272

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures, and processes to adhere to legal compliance requirements. There are systems in place to maintain awareness of and to ensure compliance with Applicable Law. In monthly meetings, new and amended legal regulations are reviewed and, if necessary, the operators of the plants are requested to implement them. Verification of the implementation of legal requirements is undertaken by means of internal audits, official inspections and external audits (quality, environmental, occupational health and safety and energy audits).
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are implemented and trained. Designated guidelines and processes for identifying and preventing Corruption are implemented and trained. Annual risk analyses have been undertaken, registers are in place, and no violations have been identified.
1.3 Code of Conduct	Conformance	A Code of Conduct, a Human Rights Code and a Supplier Code which address environmental, social and governance principles are available at: https://www.trimet.eu/de/trimet/compliance
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The integrated management Policy is consistent with the environmental, social, and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The integrated Corporate Policy guidelines are approved by management and are reviewed and evaluated annually during the management review.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The integrated Corporate Policy is available at several places for internal and external stakeholders. Internal stakeholders are trained.
2.2 Leadership	Conformance	A Board Member has been nominated as the senior Management Representative by the TRIMET Management Board.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds valid ISO 14001:2015 and ISO 45001:2018.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System is covered by the implemented Occupational Health and Safety (OH&S) Management System, TRIMET's compliance system and TRIMET's Human Rights Code. The Entity has implemented and documented an OH&S Management System and holds a valid ISO 45001:2018 certificate.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented a Supplier Code of Conduct for its suppliers covering environmental, social and governance issues.
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are organized at the TRIMET Board-level, based on law and the Company Handbook.
2.6 Emergency Response Plan	Conformance	An Emergency Response Plan, developed as part of ISO 14001 and ISO 45001 is implemented.
2.7 Mergers and Acquisitions	Conformance	Merger and acquisition requirements of the ASI Performance Standard are fulfilled at the TRIMET Board-level based on the Company Handbook.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning requirements are established in German Law, and the requirements of the ASI Performance Standard are fulfilled at the TRIMET Board-level.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is included in TRIMET's Sustainability Report, prepared in accordance with the GRI Sustainability Reporting Guidelines (core option): https://www.trimet.eu/en/downloads/sustainability-reports
3.2 Non-compliance and liabilities	Conformance	Violations and liabilities are reported in the Sustainability Report: https://www.trimet.eu/en/downloads/sustainability-reports There have been no violations and liabilities in recent years.
3.3a Payments to governments (legal and contractual)	Conformance	No payments to governments were made. Donations to political party and business forums are published in the Sustainability Report, as applicable.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	All stakeholders have opportunity to submit complaints, grievances and requests for information in person or online at any time.

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	A Life Cycle Assessment (LCA) of the production of unalloyed ingot/sow/slab/T-bar, alloyed slab, alloyed billet and primary foundry allow (PFA) ingot, has been undertaken to calculate the environmental impact of Aluminium Products from cradle to gate. The LCA meets ISO 14040 and ISO 14044 requirements.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA report (cradle to gate) is made available to interested customers upon request through the Sales Department.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity does not publish its LCA, however it can be requested from the Sales Department, who are instructed on what and how to communicate the results of the LCA.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	An Aluminium Process Scrap recycling plan, including targets, plans and projects, is implemented to cover every process where scrap can occur. All scrap is collected and recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	An Aluminium Process Scrap recycling plan is implemented to cover every process where scrap can be accrued. Scrap is collected by types of alloys or alloy groups.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	TRIMET supports various activities of industry associations, including European Aluminium and Aluminium Deutschland, in order to promote recycling of End of Life products.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity cooperates with customers in order to collect scrap and realise its closed-loop strategies.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Greenhouse Gas (GHG) emissions and energy use are publicly disclosed in the Sustainability Report, pages 26 and 27: https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf
5.2 GHG emissions reductions	Conformance	The Entity is certified according to ISO 50001:2018 and DIN EN ISO 14001:2015. GHG emissions targets are documented and tracked in the energy and

CRITERION	RATING	COMMENT
		environmental program and in key figure profile. The strategic goal is published at: https://www.trimet.eu/en/trimet/sustainability/environmental-and-climate-protection
5.3a Aluminium Smelting (management system)	Conformance	The Entity's Management System that addresses direct GHG emissions is subject to the European Union Emission Trading System (EU ETS) and therefore monitored and audited. In addition, the management of direct GHG emissions is part of the Environmental Management System.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity is certified according to ISO 50001:2018 and ISO 14001:2015. GHG emissions targets are documented and tracked in the Energy and Environmental program and in key figure profile. The Scope 1 and Scope 2 GHG emissions of the Entity's Aluminium Smelter is currently approximately 8 tonnes CO ₂ -e per metric tonne Aluminium.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the smelter commenced production before 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity's air emissions are continuously measured and monitored and the legally prescribed limits are complied with. Programs to reduce emissions are in place as part of the Environmental Management System. Relevant emissions are reported annually in the Pollutant Release and Transfer Register (PRTR) and presented in the Sustainability Report, pages 26 - 28: https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf
6.2 Discharges to Water	Conformance	The Entity's Management System is certified according to ISO 14001 and Discharges to Water are strictly controlled according to the Entity's permit to operate. The German administration (LANUV) monitors the Entity.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and soil has been completed by following the risk assessment process of the Environmental Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Assessment and management of Spills and Leakage is defined in the Environmental Management System which fulfills the legal requirements with regard to external communication, compliance controls and monitoring programs.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of Spills is defined in the Entity's emergency plan, which is in accordance with German law.
6.4b Reporting of Spills (regular reporting)	Conformance	Any Spill or release and the remedial action taken by the Entity are reported in the Sustainability Report. There were no releases reported in the 2021 Sustainability Report.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management system, as mandated in German law.
6.5b Waste management and reporting (disclosure)	Conformance	Waste management concepts are obligated by German law and are addressed in the Environmental Management System. The relevant data are shown in the TRIMET Sustainability Report, page 29: https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	All Spent Pot Lining (SPL) is separately collected and stored in a closed shed until proper disposal to prevent their release into the environment. This is verified by the authority.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	SPL is collected and stored separately in two fractions. The first cut (carbon lining) is used as a substitute fuel in the mineral wool industry. The second cut (refractory) is fully recycled.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	SPL is treated with water. The wastewater produced is treated in a separate wastewater treatment plant.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	SPL is 100% reused or recycled so that there is no need of alternatives. Apart from this, further disposal options are constantly being sought.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	There is no SPL discharged into marine and aquatic environments.
6.8a Dross (recovery)	Conformance	Dross from internal processes is 100% remelted or recovered at the TRIMET Aluminium SE Gelsenkirchen site.
6.8b Dross (recycling)	Conformance	Dross from internal processes is 100% remelted or recovered at TRIMET Aluminium SE, Gelsenkirchen site.
6.8c Dross (review of alternatives)	Not Applicable	There is no disposal of Dross. Dross is 100% recycled at the TRIMET Aluminium SE Gelsenkirchen site.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has implemented a process for the mapping, measurement and monitoring of water. Water withdrawal and sewage disposal are tracked.
7.1b Water assessment (risk assessment)	Conformance	A risk assessment regarding water usage and discharge is addressed as part of the Environmental Management System.
7.2a Water management (management plans)	Not Applicable	This Criterion does not apply as water-related risks are assessed and documented as low.
7.2b Water management (monitoring)	Not Applicable	This Criterion does not apply as water-related risks are assessed and documented as low.
7.3 Disclosure of water usage and risks	Conformance	The Entity complies with all mandatory requirements of the respective water agency and discloses its water withdrawal and use in the Sustainability Report, page 23: https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken an Environmental Impact Assessment as part of the approval processes, that included Biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable to the Entity, because the Biodiversity assessment did not identify material impacts.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable to the Entity, because the Biodiversity assessment did not identify material impacts.
8.2c Biodiversity management (reporting)	Conformance	The outcomes of the biodiversity assessment are published in the Sustainability Report, pages 25-26 (304-1 and 304-4): https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf
8.3 Alien Species	Conformance	The Entity proactively prevents introduction of Alien Species by ensuring that the main carrier medium (which is wood) is processed in a way to avoid the transport of such species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity is committed to respecting Human Rights as addressed in the TRIMET Human Rights Code: https://www.trimet.eu/fileadmin/downloads/de/Kodex/trimet-human-rights-code-en-2020.pdf
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process is established. It refers to the OECD Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain.
9.1c Human Rights Due Diligence (remediation)	Conformance	Human Rights impacts are assessed by a risk-based approach. To date no major impact on Human Rights has been identified.
9.2 Women’s Rights	Conformance	TRIMET communicates in its Code of Conduct, Human Rights Code and Supplier Code the commitment to non-discrimination of women and promotes women's empowerment principles.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in Germany.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in Germany.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no cultural and sacred heritage sites and values as part of the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no Resettlement necessary.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no Resettlement necessary.
9.7a Local Communities (rights and interests)	Not Applicable	The outcome of the Human Rights Due Diligence conducted has not identified the presence of issues affecting Local Communities.
9.7b Local Communities (impacts)	Not Applicable	The outcome of the Human Rights Due Diligence conducted has not identified the presence of issues affecting Local Communities.
9.7c Local Communities (livelihoods)	Not Applicable	The outcome of the Human Rights Due Diligence conducted has not identified the presence of issues affecting Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a process to ensure it does not source any material from Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has an external service provider who trains their employees to respect Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a well-established works committee, established and operated in accordance with German law.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity's collective bargaining agreement is based on that for the chemical industry (IG BCE). The Entity has additional agreements with the works committee that are valid for all employees.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as there is no restriction to Freedom of Association and Collective Bargaining in Germany. TRIMET has an elected works committee.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in Germany. Young Workers (15 to 18 years) are under special protection by law and are not allowed to work in hazardous working

CRITERION	RATING	COMMENT
		conditions. Employees and plant managers are aware of these legal regulations.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in Germany. Young Workers (15 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. Employees and plant managers are aware of these legal regulations.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in Germany. Young Workers (15 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. Employees and plant managers are aware of these legal regulations.
10.3a Forced Labour (human trafficking)	Conformance	The Entity commits itself to respect Human Rights, and expects its suppliers to do the same. The Entity only works with trustworthy employment agencies and does not participate in any form of Forced Labour: https://www.trimet.eu/en/trimet/compliance
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour, neither direct nor through recognized labour agencies. Deposits or security payments are neither allowed nor practiced.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in Forced Labour. Deposits or security payments are neither allowed, nor practiced.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour. Deposits or security payments are neither allowed nor practiced.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction of movement at the workplace, except where required due to process or safety reasons.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. There is no retention of Workers' original documents and only copies of original documents are held.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of the working contract is regulated in the collective bargaining agreement of the metal industry and by law.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and implements the TRIMET Human Rights Code. The Entity expects the same from its suppliers, which is outlined in TRIMET's Supplier Code.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the Workers and the Workers' representatives is established. A web-

CRITERION	RATING	COMMENT
		based 'whistleblower' system (TRIMET Integra) is implemented: https://www.trimet.eu/de/trimet/compliance/trimet-integra
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are regulated by law.
10.7a Remuneration (living wage)	Conformance	Wages are regulated through the collective bargaining agreement of the chemical sector.
10.7b Remuneration (method of payment)	Conformance	All wage payments are made by the Entity on time. They are documented and submitted at the end of the month to the employees' bank accounts.
10.8 Working Time	Conformance	Working time is governed by German law and the collective bargaining agreements. Legal requirements are complied with and monitored by the works council.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety Management System (in accordance with ISO 45001) and the TRIMET Integrated Corporate Policy.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational Health and Safety (OH&S) Management System ensures that Workers and Visitors comply with the respective Policies.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Integrated Corporate Policy contains the commitment to comply with Applicable Law. TRIMET's Human Rights Code refers to the ILO Declaration on Fundamental Principles and Rights at Work.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Workers are made aware of the hazards at work and are given instructions on how to behave safely and how to use safety equipment. Workers are given an occupational safety guide, which outlines the right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented an OH&S Management System and holds a valid ISO 45001:2018 certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has a health and safety committee that meets four times a year.
11.4 OH&S performance	Conformance	The Entity records various indicators to assess OH&S performance. Health and safety targets and improvements are documented in key figure profile and compared with other TRIMET plants. Figures are also provided to professional associations and

CRITERION	RATING	COMMENT
		federations. For further information, see the Sustainability Report (GRI 403-9): https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/trimet-Sustainability_Report_2021.pdf

Document Control and Version History

Revision	Date	Notes
0	14 April 2023	Initial Certification Audit - Full Certification