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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# TRIMET ALUMINIUM SE

CERTIFICATE  
NUMBER

153

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

TÜV NORD CERT  
GMBH

DATE OF ISSUE

28 SEPTEMBER 2021

DATE OF EXPIRY

27 SEPTEMBER 2024

CERTIFIED SINCE

28 SEPTEMBER 2021

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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Production and trading of foundry alloys, wrought alloys and master alloys from recycled aluminium scrap, dross and primary aluminium by remelting/refining and casting at the Gelsenkirchen site (Germany).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET Aluminium SE
CERTIFICATION SCOPE	Production and trading of foundry alloys, wrought alloys and master alloys from recycled aluminium scrap, dross and primary aluminium by remelting/refining and casting at the Gelsenkirchen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	TÜV NORD CERT GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>27 – 28 July 2021</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>25 August 2021</li></ul>
AUDIT SCOPE	<p>The audit scope includes the production and trading of foundry alloys, wrought alloys and master alloys from recycled aluminium scrap, dross and primary aluminium by remelting/refining and casting at the Gelsenkirchen site.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ 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.
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CERTIFICATION PERIOD	28 September 2021 –27 September 2024
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DUE DATE	21 September 2024
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CERTIFICATE NUMBER	153
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Legal compliance is ensured by processes at TRIMET Aluminium SE.
1.2 Anti-Corruption	Conformance	Policies and processes to identify and prevent Corruption are implemented and trained.
1.3 Code of Conduct	Conformance	A Code of Conduct, a Human Rights Code and a Supplier Code which cover environmental, social and governance principles are available for all stakeholders on the TRIMET website.
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 included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The integrated Corporate Policy guidelines were 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 annually.
2.2 Leadership	Conformance	A Board Member has been nominated as the senior management representative by the management board of TRIMET Aluminium SE.
2.3a Environmental and Social Management Systems (environmental)	Conformance	TRIMET Gelsenkirchen has implemented and documented an Environmental Management System and holds valid DIN EN ISO 14001:2015 and ISO 45001:2018 certificates by TÜV NORD Germany.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems is covered by the implemented Occupational Health and Safety Management System and its legal compliance system. TRIMET Gelsenkirchen has implemented and documented an Occupational Health and Safety System and holds a valid DIN ISO 45001:2018 certificate.
2.4 Responsible Sourcing	Conformance	The Supplier Code is communicated to the relevant suppliers. A responsible sourcing process is implemented and is practised.
2.5 Impact Assessments	Conformance	Environmental, social, cultural and Human Rights Impact Assessments are organized at board level, based on law and the company handbook.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	An Emergency Response Plan as part of ISO 14001 is implemented and trained.
2.7 Mergers and Acquisitions	Conformance	Merger and acquisition requirements of the ASI Performance Standard are fulfilled at board level of TRIMET Aluminium SE based on the company handbook.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning requirements are established in German Law. Closure and decommissioning requirements of the ASI Performance Standard are fulfilled at board level of TRIMET Aluminium SE.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	TRIMET Aluminium SE has prepared its sustainability report in accordance with the GRI Sustainability Reporting Guidelines (core option), which is published in German: <a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a> and in English: <a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a>
3.2 Non-compliance and liabilities	Conformance	No violations are mentioned in the sustainability report. No violations are known from the interviews conducted or from generally accessible publications.
3.3a Payments to governments (legal and contractual)	Conformance	Payments to governments did not take place according to the auditees and were not identified in the audit.
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. The process for complaints handling at TRIMET Aluminium SE has been proven.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	A Life Cycle Assessment to meet ISO 14040 and ISO 14044 requirements was carried out.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The current Life Cycle Assessment report (cradle to gate) will be made available to interested customers upon request through the sales department.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	TRIMET Aluminium SE's Department of Metal management was instructed about ASI process instruction on what and how to communicate the assumptions and system boundaries of the Life Cycle Assessment.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The scrap utilisation rate average at TRIMET Gelsenkirchen is between 97 to 98%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	An aluminium process scrap recycling plan is in place at 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	Recycling is the key activity of TRIMET Gelsenkirchen. The Entity encourages its customers and suppliers to recycle aluminium to the extent possible.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	TRIMET Aluminium SE supports various activities of the associations GDA (General Association of the Aluminum Industry or Gesamtverband der Aluminiumindustrie e.V.), VDM (Association of German Metal Dealers or Verband Deutscher Metallhändler e.V.), WVM (Economic Association Metals or WirtschaftsVereinigung Metalle) in order to promote recycling of end-of-life products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	GHG emissions and energy consumption are publicly disclosed in the TRIMET Sustainability Report, pages 24 and 25, which is published in German: <a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a> and in English: <a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a>
5.2 GHG emissions reductions	Conformance	TRIMET Gelsenkirchen is certified according to DIN EN ISO 50001:2018 and DIN EN ISO 14001:2015. Emission targets are documented and tracked in the energy and environmental program and in the key figure profile. The strategic goal is published on the TRIMET website: <a href="https://www.trimet.eu/de/ueber_trimet/nachhaltigkeit/umwelt-und-klimaschutz">https://www.trimet.eu/de/ueber_trimet/nachhaltigkeit/umwelt-und-klimaschutz</a>

CRITERION	RATING	COMMENT
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	<p>Relevant 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 Sustainability Report, page 27, which is published in German:</p> <p><a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a></p> <p>and in English:</p> <p><a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a></p>
6.2 Discharges to Water	Conformance	<p>The relevant data are shown in the TRIMET Sustainability Report, pages 21 – 23, which is published in German:</p> <p><a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a></p> <p>and in English:</p> <p><a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a></p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An assessment of the most significant risk areas of operations where spills and leakage may contaminate air, water, and soil is performed in accordance with the environmental management system risk assessment process.
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.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of spills is defined in the emergency plan of TRIMET Gelsenkirchen.
6.4b Reporting of Spills (regular reporting)	Conformance	Releases and remedial actions taken are reported in the Sustainability Report. There were no releases in 2019.
6.5a Waste management and reporting (strategy)	Conformance	A waste management system, mandatory by German law, is implemented.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	Waste management concepts are obligated by German law and part of the environmental management system. The relevant data are shown in the TRIMET Sustainability Report, page 28, which is published in German: <a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a> and in English: <a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a>
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross as external input material as well as dross from internal processes are 100 percent remelted or recovered on site.
6.8b Dross (recycling)	Conformance	Dross as external input material as well as dross from internal processes are 100 percent remelted or recovered on site.



CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable. There is no disposal of dross, dross is 100 percent recycled on site.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water usage is tracked and documented. No process wastewater is generated during the processes.
7.1b Water assessment (risk assessment)	Conformance	TRIMET Gelsenkirchen regularly assesses water-related risks. There is no risk.
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	There are no risks and therefore no plans for monitoring.
7.3 Disclosure of water usage and risks	Conformance	TRIMET Gelsenkirchen discloses its water withdrawal and use in the Sustainability Report and did not identify any water-related risks, available on the website in German: <a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a> and in English: <a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	An assessment of biodiversity at the Gelsenkirchen site was carried out as part of the environmental law.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There are no risks and therefore there is no Biodiversity Action Plan needed.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The surrounding area of the plant is characterized as industrial and has no potential relating to biodiversity. There is no measurable adverse impact on areas of critical habitat.
8.2c Biodiversity management (reporting)	Conformance	The outcomes of the biodiversity assessment are published in the Sustainability Report, in German: <a href="https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf">https://www.trimet.eu/de/geschaeftsberichte/trimet-nachhaltigkeitsbericht-2019-de.pdf</a> and in English: <a href="https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf">https://www.trimet.eu/en/geschaeftsberichte/trimet-sustainability-report-2019-en.pdf</a>
8.3 Alien Species	Conformance	TRIMET Aluminium SE 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.

CRITERION	RATING	COMMENT
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	TRIMET Aluminium SE is committed to respecting human rights in its Human Rights Code: <a href="https://www.trimet.eu/de/agbs_pdf/trimet-menschenrechtskodex-de-2020.pdf">https://www.trimet.eu/de/agbs_pdf/trimet-menschenrechtskodex-de-2020.pdf</a>
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process is established. It is integrated in the Responsible Sourcing process of the Department of Metal management taking into consideration the 5 steps of the OECD Due Diligence Guidance for Responsible Supply Chains.
9.1c Human Rights Due Diligence (remediation)	Not Applicable	Human Rights impacts are assessed by a risk based approach. To date no major impact on Human Rights was identified.
9.2 Women’s Rights	Conformance	TRIMET Aluminium SE communicates in its Code of Conduct, Human Rights Code and Supplier Code the commitment to non-discrimination and expects the same from its suppliers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples as part of the Facility’s Certification Scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples as part of the Facility’s Certification Scope.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there is no cultural and sacred heritage as part of the Facility’s Certification Scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no resettlement necessary as part of the Facility’s Certification Scope.

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no resettlement necessary as part of the Facility's Certification Scope.
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 implemented a process in order to ensure it does not source any material from Conflict-Affected and High Risk Areas.
9.9 Security practice	Conformance	The external service provider ensures respect for Human Rights and trains its employees accordingly.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	TRIMET Gelsenkirchen has a well established works committee according to German law.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Based on the collective bargaining agreement for the metal industry, TRIMET Aluminium SE has additional agreements between the company and the works committee, that are valid for all employees.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Not applicable, as there is no restriction to the freedom of association and collective bargaining agreement in Germany. TRIMET Aluminium SE has an elected works committee.
10.2a Child Labour (minimum age)	Conformance	Child labour is prohibited in Germany. Young workers (from the age of 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, which was confirmed in interviews.
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Germany. Young workers are (15 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions or night shifts. Employees and plant managers are aware of these legal regulations, which was confirmed in interviews.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Germany. Young workers are (15 to 18 years) are under special protection by law and not allowed to work in hazardous working conditions or night shifts. Employees and plant managers are aware of these legal regulations, which was confirmed in interviews.
10.3a Forced Labour (human trafficking)	Conformance	TRIMET Aluminium SE commits itself to respect human rights - and expects its suppliers to do the same. TRIMET Aluminium SE only works with trustworthy employment agencies. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.3b Forced Labour (deposits, fees, advances)	Conformance	TRIMET Aluminium SE is not involved in forced labour, neither direct nor through recognized labour agencies. Neither deposits nor security payments are required. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.3c Forced Labour (migrant workers)	Conformance	TRIMET Aluminium SE is not involved in forced labour. No deposits or security payments are permitted. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.3d Forced Labour (debt bondage)	Conformance	TRIMET Aluminium SE is not involved in forced labour, deposits or security payments are neither allowed nor practiced. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.3e Forced Labour (freedom of movement)	Conformance	TRIMET Aluminium SE is not involved in forced labour. There is no restriction of movement at the workplace - except where required due to process or safety reasons. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	TRIMET Aluminium SE is not involved in forced labour. There is no retention of original documents of workers, only copies of original documents are held. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.3g Forced Labour (freedom to terminate employment)	Conformance	TRIMET Aluminium SE 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. TRIMET Aluminium SE is a BME (Association Materials Management, Purchasing and Logistics) Code of Conduct certified company: <a href="https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie">https://www.trimet.eu/en/ueber_trimet/compliance/bme-verhaltensrichtlinie</a>
10.4 Non-Discrimination	Conformance	TRIMET Aluminium SE is committed to non-discrimination and communicates this commitment in its Human Rights Code. TRIMET Aluminium SE expects the same from its suppliers in its Supplier Code.
10.5 Communication and engagement	Conformance	Direct and frequent communication with the workers and the worker representatives is established. A web-based whistleblower system - TRIMET Integra - is implemented.
10.6 Disciplinary practices	Conformance	TRIMET Aluminium SE respects its employees, disciplinary measures are regulated by law.
10.7a Remuneration (living wage)	Conformance	All wages are regulated through the collective bargaining agreement of the metal sector.
10.7b Remuneration (method of payment)	Conformance	All payments are made on time. They are documented and submitted at the end of the month to the employees' bank accounts.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	TRIMET Gelsenkirchen is certified according to ISO 45001:2018 and TRIMET Aluminium SE has published its integrated Company Policy on the internet: <a href="https://www.trimet.eu/de/agbs_pdf/trimet-unternehmenspolitik-de-2020-08.pdf">https://www.trimet.eu/de/agbs_pdf/trimet-unternehmenspolitik-de-2020-08.pdf</a>

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The ISO 45001:2018 Occupational Health and Safety Management System ensures that workers and visitors comply with the respective guidelines.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Integrated Company Policy includes a commitment to comply with applicable laws and the ILO Occupational Health and Safety Convention.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	In the occupational safety guide, every employee is given the right to refuse unsafe work.
11.2 OH&S Management System	Conformance	TRIMET Gelsenkirchen has implemented an Occupational Health and Safety Management System and holds a valid DIN ISO 45001:2018 certificate.
11.3 Employee engagement on health and safety	Conformance	The health and safety committee meets 4 times a year.
11.4 OH&S performance	Conformance	Health and safety targets and improvements are documented in key figure profile.

#### **Document Control and Version History**

Revision	Date	Notes
0	28 September 2021	Initial Certification Audit - Full Certification