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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

**TRIMET  
ALUMINIUM SE  
(HAMBURG)**

CERTIFICATE  
NUMBER

298

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

TÜV NORD  
CERT GMBH

DATE OF ISSUE

8 AUGUST 2023

DATE OF EXPIRY

7 AUGUST 2026

CERTIFIED SINCE

8 AUGUST 2023

AUTHORISED BY

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

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

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CERTIFICATION SCOPE

Production of aluminium products in the form of  
liquid aluminium and sows at the TRIMET  
Aluminium Hamburg site (Germany).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET Aluminium SE (Hamburg)
CERTIFICATION SCOPE	Production of aluminium products in the form of liquid aluminium and sows at the TRIMET Aluminium Hamburg site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	Performance Standard V2
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>24 – 25 April 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>16 June 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers the production of aluminium products in the form of liquid aluminium and sows at the TRIMET Aluminium Hamburg site (Germany).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- 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            8 August 2023 – 7 August 2026

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NEXT AUDIT TYPE                Re-Certification Audit

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NEXT AUDIT DUE DATE           7 August 2026

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CERTIFICATE NUMBER            298

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## 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 regular 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 carried out by means of internal audits, official inspections and external audits (quality, environmental, occupational health and safety and energy audits).
1.2 Anti-Corruption	Conformance	The Entity has implemented 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 carried out, registers are in place and no violations have been identified.
1.3 Code of Conduct	Conformance	The Entity has developed and implemented 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 Entity's website: <a href="https://www.trimet.eu/de/trimet/compliance">https://www.trimet.eu/de/trimet/compliance</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's integrated management Policy is consistent with the environmental, social, and governance requirements included in the ASI Performance Standard <a href="https://www.trimet.eu/de/trimet/compliance">https://www.trimet.eu/de/trimet/compliance</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The integrated Corporate Policy guidelines have been 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 also trained <a href="https://www.trimet.eu/de/trimet/compliance">https://www.trimet.eu/de/trimet/compliance</a>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	A Board Member has been nominated by the Entity as the senior Management Representative by the management board of TRIMET Aluminium SE.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and holds valid DIN EN ISO 14001:2015 and ISO 45001:2018 certificates by TÜV NORD CERT Germany: <a href="https://www.trimet.eu/en/downloads/certificates">https://www.trimet.eu/en/downloads/certificates</a>
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System is incorporated into the Entity's Occupational Health and Safety Management System, compliance system and Human Rights Code. The Entity 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 Entity has developed and implemented a Supplier Code of Conduct for its suppliers which addresses environmental, social and governance issues. During the audit, the Purchasing Department was assessed and the Policy was discussed in detail. Based on correspondence with customers, it was possible to verify the dissemination and implementation of the Code of Conduct. The Supplier Code is communicated to the respective suppliers. A responsible procurement process has been implemented and an annual supplier evaluation is undertaken.
2.5 Impact Assessments	Conformance	As described in the Entity's Corporate Handbook, environmental, social, cultural and Human Rights Impact Assessments are facilitated by senior management (i.e. Board level), and is based on law and the Company Handbook, procedures and checklists.
2.6 Emergency Response Plan	Conformance	An Emergency Response Plan (ERP) as part of ISO 14001 and ISO 45001 has been implemented. Training related to the ERP has been provided to relevant persons. External Stakeholders including the Local Community and relevant authority are involved. Regular training with the local fire fighters, the Community and Workers is also undertaken.
2.7 Mergers and Acquisitions	Conformance	Merger and acquisition requirements are facilitated by senior management (i.e. at Board level) and adheres to the process as outlined in the Company Handbook, procedures and checklists.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	All closure and divestment processes are ruled by German Law. Closure and decommissioning requirements are facilitated by senior management (i.e. at Board level) and adheres to the process as outlined in the Company Handbook, procedures and checklists.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has prepared its Sustainability Report in accordance with the GRI Sustainability Reporting Guidelines (core option): <a href="https://www.trimet.eu/en/trimet/sustainability">https://www.trimet.eu/en/trimet/sustainability</a> Further ESG-related news are published at: <a href="https://www.trimet.eu/en/press/whats-new">https://www.trimet.eu/en/press/whats-new</a>
3.2 Non-compliance and liabilities	Conformance	Violations and liabilities are reported in the Entity's Sustainability Report. There have been no violations and liabilities in recent years (refer to GRI 205-3, 206-1, 307-1 & 419-1 in the Sustainability Report).
3.3a Payments to governments (legal and contractual)	Conformance	There are no payments made to the Government other than those required by law.
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. A gender-sensitive complaint management is available. The Entity has also established a web-based whistleblowing system, 'TRIMET Integra' through which stakeholders can report complaints, grievances and requests for information. In addition, there is a telephone-based grievance management system.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has completed a Life Cycle Assessment (LCA) undertaken in accordance with ISO 14040 and ISO 14044 requirements. The LCA refers to the production of unalloyed liquid aluminium and unalloyed sows. The aim of the study is to calculate the environmental impact of these products from cradle to gate.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The current Life Cycle Assessment report (cradle to gate) is made available to interested customers upon request via the Entity's Sales Department.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity does not publish its LCA, however it can be requested via the Sales Department. This Department has also been 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	There is no Aluminium Process Scrap generated at the Entity. No scrap is produced neither in the smelter, nor during the casting of Primary Aluminium.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	No alloys are produced at the Entity.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity supports various activities of associations (e.g. 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 has established a goal to take back the scrap from their customers at a 1:1 ratio and to deliver the material back to the customer in a closed cycle. This goal is pursued by the Entity's Purchasing Department through corresponding contracts and implemented in various cases.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity's GHG emissions and energy use are publicly disclosed in the Sustainability Report, refer to GRI 302 and 305: <a href="https://www.trimet.eu/en/downloads/sustainability-reports">https://www.trimet.eu/en/downloads/sustainability-reports</a>
5.2 GHG emissions reductions	Conformance	The Entity is certified according to DIN EN ISO 50001:2018 and DIN EN ISO 14001:2015. GHG emissions targets are documented and tracked in the energy and environmental program and the key figure profile: <a href="https://www.trimet.eu/en/downloads/certificates">https://www.trimet.eu/en/downloads/certificates</a> The strategic goal relating to GHG emissions reductions is published on Entity's website: <a href="https://www.trimet.eu/en/trimet/sustainability/environmental-and-climate-protection">https://www.trimet.eu/en/trimet/sustainability/environmental-and-climate-protection</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity's Management System regarding Direct GHG emissions is subject to the European Union Emission Trading System (EU ETS) and therefore monitored and audited. In addition, the management

CRITERION	RATING	COMMENT
		of Direct GHG emissions is part of the Environmental Management System according to DIN EN ISO 14001.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	GHG emissions targets are documented and tracked in the energy and environmental program and the key figure profile. The Scope 1 and Scope 2 GHG emissions of the Aluminium Smelter at the Entity are already approximately 8 tonnes CO <sub>2</sub> -e per metric tonne Aluminium, refer to Sustainability Report GRI 302 and 305: <a href="https://www.trimet.eu/en/downloads/sustainability-reports">https://www.trimet.eu/en/downloads/sustainability-reports</a>
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as the smelter commenced production prior to 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity's emissions to air are continuously measured and monitored and the legally prescribed limits are complied with. Programs to reduce emissions have been implemented as part of the Environmental Management System. Relevant emissions are reported annually in the Pollutant Release and Transfer Register (PRTR) Report and also in the Sustainability Report, refer GRI 305: <a href="https://www.trimet.eu/en/downloads/sustainability-reports">https://www.trimet.eu/en/downloads/sustainability-reports</a>
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 (BUKEA) monitors the Entity. Refer GRI 303 in the Sustainability Report: <a href="https://www.trimet.eu/en/downloads/sustainability-reports">https://www.trimet.eu/en/downloads/sustainability-reports</a>
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 is undertaken by the Entity. Assessment of water-related risks is required under German law regulation on facilities for handling substances hazardous to water.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The assessment and management of Spills and Leakage is defined in the Environmental Management System and the Emergency Response Plan.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed an alarm and hazard prevention plan in accordance with German law. In



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		addition to the specific crisis management response, this process also describes the mechanisms for informing those affected immediately after an incident.
6.4b Reporting of Spills (regular reporting)	Conformance	Releases and remedial actions taken are reported in the Sustainability Report, refer to GRI 306-3. There were no significant releases in the reporting period. <a href="https://www.trimet.eu/en/trimet/sustainability">https://www.trimet.eu/en/trimet/sustainability</a>
6.5a Waste management and reporting (strategy)	Conformance	German law defines the waste hierarchy. In addition to the legal obligation to avoid waste, targets for reducing waste and recycling waste must be formulated within the framework of ISO 14001 and must also be demonstrated through appropriate measures. This was verified during the audits.
6.5b Waste management and reporting (disclosure)	Conformance	Waste management disclosure is obligated by German law and part of the Environmental Management System. The relevant data are shown in the Entity's Sustainability Report.
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.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	SPL is collected and stored separately in two section (cut). The first cut (carbon lining) is used as a substitute fuel in the mineral wool industry. The second cut (refractory/insulation material) is separated by grain size and recycled completely.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	SPL is stored on site in accordance with the permit and disposed of in accordance with the legal

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		requirements. Within the framework of German legislation, the disposal route and the recycling or disposal procedure are specified and each individual disposal process is monitored.
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 Entity.
6.8b Dross (recycling)	Conformance	Dross from internal processes is 100% remelted or recovered at the Entity.
6.8c Dross (review of alternatives)	Conformance	Dross from internal processes is 100% remelted or recovered at the Entity.
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 withdrawals sewage disposal are tracked - refer to Sustainability Report, GRI 303: <a href="https://www.trimet.eu/en/downloads/sustainability-reports">https://www.trimet.eu/en/downloads/sustainability-reports</a>
7.1b Water assessment (risk assessment)	Conformance	A risk assessment regarding water usage and discharge is conducted as part of the Environmental Management System. The Entity has not identified any risk for water use.
7.2a Water management (management plans)	Conformance	Water-related risks have been assessed and documented as low. At the Entity, well water is extracted and used for cooling purposes and then discharged directly into a surface water body. Drinking water from the public network is used exclusively as drinking and sanitary water. Domestic wastewater is discharged into the public sewer system.
7.2b Water management (monitoring)	Conformance	As part of the regulatory approval process and the risk assessment, it was determined that there are no water-related risks.
7.3 Disclosure of water usage and risks	Conformance	The Entity discloses its water withdrawal and use in the Sustainability Report, GRI 303-1 & 303-2: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports</a>

CRITERION	RATING	COMMENT
		The Entity complies with all mandatory requirements of the respective water agency.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken environmental impact assessments as part of the approval processes according to German law that include Biodiversity features and issues.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the Biodiversity assessment determined there were no material risks identified that would require any action plans.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the Biodiversity assessment determined there were no material risks identified that would require any action plans.
8.2c Biodiversity management (reporting)	Conformance	The outcomes of the Biodiversity assessment are published in the Sustainability Report, refer to GRI 304-1 & 304-4: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports</a>
8.3 Alien Species	Conformance	The purchasing function at the Entity proactively ensures that the introduction of foreign species is prevented by processing the main carrier medium (wood) in such a way that the transport of such species is avoided.
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 operations)	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 described by the United Nations International Labour Organization in its Declaration on Principles and Rights at Work and in the UN Guiding Principles on Business and Human Rights. The Entity has set out these principles in its Human Rights Code. It includes principles for employees, for residents living

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		<p>near production sites, and for suppliers. The commitment is outlined in the Entity's Human Rights Code:</p> <p><a href="https://www.trimet.eu/en/trimet/compliance/code-of-human-rights">https://www.trimet.eu/en/trimet/compliance/code-of-human-rights</a></p>
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process has been implemented and 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 have been identified.
9.2 Women's Rights	Conformance	<p>The Entity 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:</p> <p><a href="https://www.trimet.eu/en/trimet/sustainability/gender-equality">https://www.trimet.eu/en/trimet/sustainability/gender-equality</a></p> <p>The works council ensures that women are not disadvantaged in recruitment. The Entity participates in projects such as 'mint:pink'</p> <p><a href="https://www.mintpink.de/beteiligte/">https://www.mintpink.de/beteiligte/</a> which enables female students to obtain a greater understanding of industrial companies.</p>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in Germany.
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 the Entity is not located on, or near a cultural or sacred heritage site.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The outcome of the Entity's Human Rights Due Diligence process has not identified the presence of issues affecting Local Communities.
9.7b Local Communities (impacts)	Conformance	The outcome of the Entity's Human Rights Due Diligence process has not identified the presence of issues affecting Local Communities.

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9.7c Local Communities (livelihoods)	Conformance	The outcome of the Entity's Human Rights Due Diligence process 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 in order to ensure not to source any material from Conflict-Affected & High Risk Areas.
9.9 Security practice	Conformance	The Entity does not have an external security providers as the Entity is located on client property.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a works council. It is regulated by law that the works council must hold four works meetings a year, to which all employees are invited. The works council maintains contact with the IG BCE trade union and the employers' associations negotiate the collective agreements with the union. The works council at the Entity cooperates on a basis of trust with the Executive Board and plant management.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Based on the collective bargaining agreement for the chemical industry (IG BCE), the Entity has additional agreements between the company and the works council that are valid for all employees. The Entity has a well-established works council according to German law. In addition, a joint works council (Gesamtbetriebsrat) exists for the German primary aluminium producing facilities.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country (Germany) where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
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 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 (5 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 lab Labour our is prohibited in Germany. Young Workers (5 to 18 years) are under special protection

CRITERION	RATING	COMMENT
		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 reputable employment agencies: <a href="https://www.trimet.eu/en/trimet/compliance">https://www.trimet.eu/en/trimet/compliance</a>
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is not involved in Forced Labour, neither direct nor through recognised labour agencies. Neither deposits nor security payments are required.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is not involved in Forced Labour. No deposits or security payments are permitted.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour, neither direct nor through recognised labour agencies. Neither deposits nor security payments are required.
10.3e Forced Labour (freedom of movement)	Conformance	There is no restriction of movement at the Entity's workplace, except where required due to process or safety reasons.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There is no retention of original documents of Workers, only copies of original documents are held.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has ensured that the time for announced termination of the working contract is regulated in the collective bargaining agreement of the chemical industry and by law.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Human Rights Code. The Entity expects the same adherence from its suppliers in its Supplier Code. The German General Equal Treatment Act (AGG) prohibits discrimination in connection with six different characteristics.
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: <a href="https://www.trimet.eu/en/trimet/compliance/trimet-integra">https://www.trimet.eu/en/trimet/compliance/trimet-integra</a>
10.6 Disciplinary practices	Conformance	There is a good working atmosphere at the Entity and all employees are treated with respect. Physical punishment, psychological or physical coercion, harassment and gender-based violence, including

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		sexual harassment, or verbal abuse of employees is prohibited under both German law and the Entity's Code of Conduct.
10.7a Remuneration (living wage)	Conformance	In Germany there is a minimum wage which is regulated by law. The Entity applies the collective bargaining agreements of IG BCE and pays at least the collectively agreed wages, which are above the minimum wages as set by law.
10.7b Remuneration (method of payment)	Conformance	All payments are made on time with salaries transferred to employees' bank accounts at the end of the month. Each employee receives his or her monthly payslip in printed form.
10.8 Working Time	Conformance	Working hours at the Entity are regulated by the collective bargaining agreement and works agreements that are coordinated with the works council. Legal requirements are complied with by the Entity 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 is certified to ISO 45001 <a href="https://www.trimet.eu/en/downloads/certificates">https://www.trimet.eu/en/downloads/certificates</a> and therefore has an Occupational Health and Safety Policy that has been made known to employees and is reviewed and adjusted as necessary. The Entity's ISO auditor reviews the requirements of the Standard on an annual basis, which include, among other things, the provision of resources by the management board.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is implemented and site-specific directives ensure 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. The Entity's Human Rights Code refers to the ILO Declaration on Fundamental Principles and Rights at Work: <a href="https://www.trimet.eu/en/trimet/compliance/code-of-human-rights">https://www.trimet.eu/en/trimet/compliance/code-of-human-rights</a>
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. In the Entity's occupational safety guide, every employee is given the right to refuse unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has implemented an OH&S Management System and holds a valid DIN ISO 45001:2018 certificate: <a href="https://www.trimet.eu/en/downloads/certificates">https://www.trimet.eu/en/downloads/certificates</a>
11.3 Employee engagement on health and safety	Conformance	Formal cooperation between management and Workers is established. The Entity meets the legal requirements and has formed a Health and Safety Committee that meets four times a year. The Entity's management discusses the topics relevant to occupational safety with the works council, the company physician, the safety officers and other persons and defines goals and measures that are pursued in this Committee.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance regularly and has several key performance indicators (KPIs) for OH&S performance. Health and safety targets and improvements are documented. Also refer to GRI 403-9 in the Sustainability Report: <a href="https://www.trimet.eu/en/trimet/sustainability">https://www.trimet.eu/en/trimet/sustainability</a>

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

Revision	Date	Notes
0	8 August 2023	Certification Audit – Full Certification