Aluminium Oxid Stade
Sustainability Report

Reporting Year 2025

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1 About AOS

In the industrial area of Stade Bützfleth, the factory of Aluminium Oxid Stade GmbH (AOS) was built between 1970 and 1973.

The AOS aluminium oxide factory is located on a 55 ha site and has an excellent infrastructure.

Production started at the end of 1973. Through constant optimisation of the process and the production facilities, we were able to increase the installed production capacity from originally 600,000 to currently approx. 1,050,000 tonnes of alumina per year. At the same time, specific emissions were significantly reduced.

Aluminium Oxid Stade GmbH is a reprocessing company owned by DADCO Alumina & Chemicals.

The raw material for alumina production is bauxite, which is provided by the owner Dadco Alumina & Chemicals. Dadco also sells the end product, alumina for electrolysis, and various grades of aluminium hydroxide, to a wide range of industries worldwide.

Thanks to the state-of-the-art technology used in Stade, even today, we produce a typical "sandy" alumina of high purity that is in demand worldwide. With the help of wet oxidation, which was developed later, a very white hydroxide is produced in dried or wet form. We can ship our products by water, rail or road.

The high standard of production and quality is also guaranteed by our integrated management system. The functioning of the systems is confirmed by certification according to the standards DIN EN ISO 9001, DIN EN ISO 14001, DIN EN ISO 50001 and DIN EN ISO 45001. A decisive part of this is the constant training of all employees, e.g. within the framework of our creativity offensive, called GMBH ("Gemeinsam Mehr Bewegen Helfen", helping to make a difference together).

Aluminium Oxid Stade GmbH, also with the support of its partners, is constantly improving its products and processes.

The high standard of our products, our pioneering wet oxidation process and, not least, our creativity offensive show that quality is a high priority at AOS.

Quality is a decisive characteristic of Aluminium Oxid Stade GmbH.

2 Corporate Policy

The company policy applies to all employees of AOS. The management and every executive commit themselves to exemplary behaviour on the basis of this policy. AOS faces up to its responsibility towards its stakeholders as well as internally with regard to the requirements for management and organisation, its social responsibility as well as in the areas of quality, environmental protection, energy and occupational safety. The above-mentioned areas work together and are integrated into all corporate processes at AOS. We promote sustainability and naturally adhere to generally recognised ethical and compliance guidelines and respect human rights.

Compliance with laws and regulations are just as self-evident for us as adherence to the high quality requirements for our product. The safety of our employees, the protection of the environment and the efficient use of energy and other resources are also important to us. We also place these high demands on the contractors and suppliers who work for us.

The fulfilment of these important tasks is only possible with our employees. Protecting their safety and health is therefore the primary goal of our corporate policy. Our integrated management system for quality, environment, energy and occupational safety applies to the entire AOS. It is regularly audited to verify its function and to close any gaps that may occur. The management sees itself as responsible for this.

In order to meet the high requirements mentioned above, the management provides adequate resources. The provision of human and material resources as well as a clear organisation, taking into account our social responsibility, form the necessary framework for continuous and sustainable improvement.

The high purity and stable quality of our products is the basis of our successful business activities.

We are aware that our activities affect the environment. Therefore, we consider it our duty to reduce these impairments as well as the use of energy to the possible minimum within the scope of economic and technical possibilities by means of well thought-out processes. In order to continuously improve in all areas, measurable goals are set, which the company is committed to achieving and which are communicated appropriately. In the context of the integrated management system, targets are set by the management that are in line with the orientation of the company policy.

Our employees are our top performers and take responsibility for their actions. Each individual receives support from us in order to be able to further educate themselves. In addition, every employee has the right and the duty to work towards the elimination of circumstances that have a negative influence on our social environment or that hinder the manufacture of our products with impeccable quality, lead to a waste of resources and environmental pollution or endanger occupational health and safety. In the medium and long term, continuous improvement is a prerequisite for us to protect the environment, increase energy efficiency and continuously develop occupational safety, health protection and compliance with social standards in the company. Errors are to be avoided and possible sources of error consistently eliminated. This requires the active cooperation of all employees.

Every year, the management commits itself to reviewing our corporate policy and to introducing corrections in line with the times.

3 Energy consumption

The processing of bauxite into aluminium oxide or hydroxide is an energy-intensive process. Through the use of state-of-the-art technology such as tube digestion and fluidised bed calcination, as well as through consistent further development of the process, AOS currently has a very low specific thermal energy consumption. This makes AOS the world leader in terms of energy efficiency.

Since 2012, AOS has been certified according to the energy management system standard ISO 50001. We record energy flows and evaluate the efficiency of energy use. The energy management system enables us to systematically identify potential for improvement and to raise it through targeted measures.

One example of this is the conversion of the overflow pumps in our settlers, which took place in 2021. The required power of the overflow pump was 130 kW on average before the measure. After the conversion, the power requirement was reduced to 70 kW and thus by 60 kW. This corresponds to a saving of 46%. Expressed in absolute figures, the measure saves approximately 360 MWh of electrical energy per year. In addition, since 2010 we have been operating a highly efficient combined heat and power plant (CHP; efficiency >80 %), with which we supply our production with both process heat and electrical energy.

In addition to ongoing optimisation measures, extensive insulation work was carried out on tanks and pipelines in 2023 in particular to reduce energy losses to a minimum. The insulation measures resulted in savings of approximately 11.500 MWh of thermal energy per year.

Table 1 Total energy consumption

Energy	2023	2024	2025	Unit
Total	1.113.867	2.178.922	2.163.254	MWh

Table 2 Total energy source consumption within the organisation from non-renewable sources

Energy source	Purpose	2023	2024	2025	Unit
Electrical energy (drawn from the grid)	Not specified	4.644	8.126	3.327	MWh
Natural gas[1]	Combustion in CHP units to generate electrical and thermal energy;	488.187	758.314	825.911	MWh
Natural gas[1]	Direct combustion in production processes (e.g. tube digestion, dryers, calcination)	557.724	1.303.954	1.225.013	MWh
Steam	Production processes	55.705	95.532	103.105	MWh
Diesel	Fuel for machines and vehicles	885	1.257	1.051	MWh

[1] Energy consumption figures stated as gross calorific value

Table 3 Total energy source consumption within the organisation from renewable sources

Energy source	Purpose	2023	2024	2025	Unit
Electrical energy (drawn from the grid)	Not specified	6.655	11.645	4.769	MWh
Diesel	Fuel for machines and vehicles	67	95	79	MWh

Table 4 Energy sold

Energy	2023	2024	2025	Unit
El. energy	2.837	4.506	6.558	MWh

3.1 Energy intensity

$$Energy\ intensity = \frac{Total\ energy\ use}{Total\ product\ output}$$

The product output includes the products aluminium oxide and aluminium hydroxide.

The energy use taken into account includes the total consumption of all energy sources used at the Stade site in the reporting year (natural gas, electrical energy and diesel).

Table 5 Energy intensity

Energy intensity	2023	2024	2025	Unit
Total	2,49	2,11	2,03	MWh/t

4 Greenhouse gas emissions

In accordance with the Greenhouse Gas Protocol (GHG Protocol), the calculation follows the financial control approach, which at AOS is synonymous with the operational control approach. This means that all emission sources over which AOS has financial or operational control are included. The methodology of the GHG Protocol in the form of the "Corporate Standard" and the "Value Chain Accounting Reporting Standard" was used for the calculation. The underlying emission factors are taken from the "UK Government GHG Conversion Factors for Company Reporting" database in the 2021 version, which is published by the Department for Environment, Food & Rural Affairs (DEFRA).

4.1 Direct GHG emissions (Scope 1)

In the so-called Scope 1, all directly controllable emissions of GHG are reported.

The most important source of emissions is the combustion of natural gas for the generation of process heat and for the generation of electrical energy in the company's own CHP plant. In addition, there are further GHGs from the combustion of fuels for the operation of machinery and the company vehicle fleet.

Table 6 Direct Emissions from Owned/Controlled Operations (Scope 1)*

Emission source	2023	2024	2025	Unit
Direct emissions from stationary combustion	190.771	376.151	374.082	t CO_2-eq
Direct emissions from mobile combustion	248	352	295	t CO_2-eq
Direct process emissions	0	0	0	t CO_2-eq
Fugitive refrigerant emissions	13,6	18,1	28	t CO_2-eq
Total	**191.033**	**376.522**	**374.405**	**t CO_2-eq**

* As a result of using an alternative source for emission factors, the reported GHG emissions have been recalculated; this methodological change has been applied retrospectively, resulting in updated figures for prior reporting years.

4.2 Indirect GHG emissions (Scope 2)

In the year under review, the consumption of electrical energy from the grid was much higher than usual. This was due to a technical defect in one of the two gas turbines of the CHP plant, as a result of which the electricity demand could temporarily no longer be covered by self-generation.

Table 7 Indirect Emissions from the Use of Purchased Electricity, Steam, Heating and Cooling (Scope 2) – Market Based

Emission source	2023	2024	2025	Unit
Indirect emissions from purchased electrical energy	3.457	6.050	2.477	t CO_2-eq
Indirect emissions from purchased steam	N/A	N/A	N/A	t CO_2-eq
Indirect emissions from purchased thermal energy	N/A	N/A	N/A	t CO_2-eq
Indirect emissions from purchased cooling	N/A	N/A	N/A	t CO_2-eq
Total	**3.457**	**6.050**	**2.477**	**t CO_2-eq**

Table 8 Indirect Emissions from the Use of Purchased Electricity, Steam, Heating and Cooling (Scope 2) – Location Based

Emission source	2023	2024	2025	Unit
Indirect emissions from purchased electrical energy	4.260	7.454	3.052	t CO_2-eq
Indirect emissions from purchased steam	N/A	N/A	N/A	t CO_2-eq
Indirect emissions from purchased thermal energy	N/A	N/A	N/A	t CO_2-eq
Indirect emissions from purchased cooling	N/A	N/A	N/A	t CO_2-eq
Total	**4.260**	**7.454**	**3.052**	**t CO_2-eq**

4.3 Other Indirect GHG Emissions (Scope 3)

Table 9 Other Indirect GHG Emissions (Scope 3)*

Scope 3 category according to GHG Protocol	2023	2024	2025	Unit
Purchased goods and services	67.559	160.224	162.934	t CO_2-eq
Fuel and energy-related activities not included in Scope 1 and 2	33.121	64.952	63.096	t CO_2-eq
Transport and delivery (upstream)	26.741	62.593	65.080	t CO_2-eq
Waste generated during operation[2]	1,9	2,6	3,2	t CO_2-eq
Total	**127.424**	**287.771**	**291.112**	**t CO_2-eq**

* As a result of using an alternative source for emission factors, the reported GHG emissions have been recalculated; this methodological change has been applied retrospectively, resulting in updated figures for prior reporting years.

[2] Emissions from energy recovery, recycling, composting and anaerobic digestion are attributed to the user of the recycled materials, not the producer of the waste, in line with GHG Protocol Guidelines.

Table 10 Unreported Scope 3 emissions and justification

Scope 3 categories not reported	Justification
Capital goods	A determination of the emissions in connection with procured capital goods is currently not possible due to the data basis and the lack of availability of suitable emission factors.
Business trips	Up to now, no records have been kept for business trips regarding distance and chosen means of transport. It is planned to change this in order to be able to make statements about the GHG emissions generated in the future. Regardless of this, the contribution of business travel to total emissions can be considered negligible.
Commuting of employees	At the time the greenhouse gas balance sheet was first drawn up, no information was available on our employees' commute to work and the means of transport they chose. Irrespective of this, the contribution to total emissions from employee commuting can be considered negligible. In addition, AOS provides employees with company buses (9-seater) depending on their place of residence in order to form car pools and reduce emissions from employee commuting accordingly.
Upstream leased assets	N/A
Transport and delivery (downstream)	As the transport of our products is partly organised by our customers, corresponding data is not fully available. It is planned to report on this category as soon as sufficient information on the transport of our products is available.
(Further) processing of sold products	The use of the products and the exact further processing is not known, which is why no statement can be made about the GHG emissions generated in the process.
Use of the products sold	The use of the products and the exact further processing is not known, which is why no statement can be made about the GHG emissions generated in the process.
End-of-life treatment of sold products	The end-of-life treatment depends on which product the aluminium oxide or hydroxide was processed into. Since this is not known, the emissions from this cannot be reliably determined.
Downstream leased assets	N/A
Franchises	N/A
Investments	N/A

4.4 GHG emission intensity

GHG emission intensity refers to all reported emissions of Scopes 1-3 and all greenhouse gases emitted therein summarised as CO equivalents.

$$GHG\ emission\ intensity = \frac{Total\ GHG\ emissions}{Total\ product\ output}$$

Table 11 GHG emisisons intensity*

GHG emission intensity	2023	2024	2025	Unit
Total Scope 1–3 – market based	0,835	0,727	0,719	t CO_2-eq/t
Total Scope 1–3 – location based	0,837	0,729	0,719	t CO_2-eq/t

* As a result of using an alternative source for emission factors, the reported GHG emissions intensity has been recalculated; this methodological change has been applied retrospectively, resulting in updated figures for prior reporting years.

4.5 Reduction of GHG emissions and Reduction Plan

One example of GHG reduction is the above-mentioned conversion of the overflow pumps in our sedimentation plants. This measure saves around 360 MWh of electrical energy per year. Taking into account the electrical and thermal efficiency of the plant and the fact that most of the heat is used as process heat, which allows GHG emissions to be offset, this results in a saving of around 107 tonnes of CO2 eq. per year.

A further significant GHG reduction results from the insulation measures mentioned above. The thermal energy saved is provided by the combustion of natural gas in our CHP plant and thus leads to a direct saving in GHG emissions of around 1300 tonnes of CO2 eq. per year.

AOS has also been participating in the 'NW DOW' energy efficiency and climate protection network since 2021. The network has set itself the goal of saving 141,000 MWh/a of energy and 26,000 t CO2-eq/a of greenhouse gas emissions (4-year plan).

In addition, AOS has developed a transformation plan that outlines the pathway for further reducing greenhouse gas emissions. Based on the implementation of the measures defined in this plan, AOS aims to reduce its GHG emissions by 40% by 2035 compared to the 2024 baseline year. Progress towards this target is regularly monitored and reviewed. Further information on the transformation plan is available upon request.

4.6 Climate Change Risk Assessment

AOS has conducted a structured climate change risk assessment for the Stade site in accordance with ASI Performance Standard V3.1. The assessment considers physical climate-related risks, transition risks and climate-related opportunities across short-, medium- and long-term time horizons. It covers AOS's own operations, relevant site infrastructure, energy and media supply, logistics interfaces, employees and contractors, as well as relevant environmental and regulatory interfaces.

The assessment identified water-related extreme weather events, storm and heavy rainfall, heat, energy supply and cost developments, and evolving regulatory and market expectations as relevant climate-related topics for the site. Existing management systems, emergency preparedness, environmental and energy management processes, and business continuity arrangements are used to manage and review these topics.

The results of the assessment are reviewed at least annually as part of the management review and updated where relevant, for example in case of material operational changes, significant weather-related events, new climate data, or changed regulatory, customer or insurance requirements. Where required, additional measures are defined, assigned and followed up internally.

5 Emissions into the air

AOS does not cause any significant air pollution. Enclosed systems and highly effective dust collection systems are installed wherever dust may occur, including bauxite unloading operations and conveyor systems used for transporting raw materials and products. Due to the exclusive use of virtually sulphur-free natural gas, SO_2 emissions are almost entirely avoided. In addition, advanced technologies such as flue gas recirculation in the tube digestion plant heaters and the design of the fluidised-bed calciners ensure that emissions of nitrogen oxides and carbon monoxide remain well below the applicable German regulatory limits.

As part of its environmental management approach, AOS continuously implements measures to minimise air emissions and their impacts. Significant further emission reductions are expected through the implementation of the company's transformation plan and the associated process modifications. The effectiveness of these measures is regularly monitored and reviewed.

Table 1: Nitrogen oxides (NO_X), sulphur oxides (SO_X) and other significant air emissions

Emission	State of aggregation	2023*	2024*	2025*	Unit
Sulphur dioxide (SO_X)	gaseous	85	195	201	kg
Carbon monoxide (CO)	gaseous	33.201	76.345	78.781	kg
Water (H_2O)	gaseous	323.110.037	742.987.544	766.695.440	kg
Nitrous oxide (N_2O)	gaseous	4.003	9.205	9.499	kg
Methane (CH_4)	gaseous	7.482	17.205	17.754	kg
Nitrogen oxides (NO_X), specified as NO_2	gaseous	67.112	154.323	159.247	kg
Organ. Gases and vapours (without methane)	gaseous	1.129	2.596	2.679	kg
Calcium oxide	dusty	136	313	323	kg
Aluminium oxide	dusty	3.474	7.988	8.243	kg
Aluminium hydroxide	dusty	524	1.204	1.243	kg
Bauxite	dusty	733	1.685	1.738	kg
Dust, remainder not further divided	dusty	292	672	694	kg
Fine dust PM_{10}	dusty	4.248	9.769	10.081	kg
Fine dust $PM_{2,5}$	dusty	2.874	6.609	6.820	kg

* Data is collected every four years, so the values were extrapolated on the basis of the last survey in 2021 with reference to the production volume

6 Water use

We obtain a large part of our water from the Elbe River and from two wells on our premises.

No wastewater is produced from the actual production process, as the caustic soda required for the process - apart from the amount of alkali discharged with the red sludge which has to be replaced - is completely recirculated.

Wastewater results from the operation of the red sludge landfill. The rainwater that falls on the landfill and does not evaporate naturally must be removed. For this purpose, a modern treatment plant was installed at AOS, which cleans and treats the excess rainwater before it is discharged into the Elbe.

Table 12 Water withdrawal and discharge

Place of withdrawal/discharge	2023	2024	2025	Unit
Groundwater abstraction	60.632	91.715	99.777	m³
Withdrawal from surface waters (Elbe)	815.000	1.437.404	1.576.783	m³
Discharge into surface waters (Elbe)	1.388.846	1.839.851	1.117.549	m³
Discharge into sewerage system	14.435	12.610	11.100	m³

Relevant water-related risks could not be identified.

AOS implements measures to minimise impacts from wastewater discharges to water bodies and monitors their effectiveness on a regular basis. In the reporting year 2025, no reportable leakages or discharge incidents occurred.

AOS promotes the efficient use of water resources by reusing water multiple times within the production process wherever technically feasible. In addition, closed-loop cooling systems are applied to minimise freshwater consumption and reduce water withdrawal.The main volume of wastewater results from precipitation on the residue disposal area, over which AOS has no influence. Water management measures and potential impacts from wastewater discharges are monitored regularly as part of the environmental management system.

7 Releases of harmful substances

There were no releases of harmful substances in the reporting years. Corresponding impact assessments or remedial measures were therefore not required. AOS continues to endeavour to substitute alternatives to substances that are hazardous to health and the environment. Examples of this are Replacing fire extinguishing agents containing PFAS, changing measurement methods to eliminate hydrofluoric acid.

8 Waste

The so-called red sludge, which consists of about 40 % water and the mineral components of the bauxite which are insoluble in caustic soda - mainly iron, silicon and titanium compounds - is a significant waste from the production of aluminium oxide.

Other wastes are mainly scrap metal generated in the course of maintenance, as well as various types of commercial waste.

Table 2: Waste by type and disposal route

Group		Treatment	2023	2024	2025	Unit
Waste wood		Recovery	31,3	63,3	49,9	t
Construction and demolition waste		Disposal	0,0	0,0	0,0	t
		Recovery	27,4	39,0	62,0	t
Electronic scrap		Recovery	19,0	12,2	32,2	t
Hazardous waste	Recovery	Recovery	20,7	23,7	15,5	t
	Insulation materials	Disposal	44,9	54,8	62,0	t
	Other	Disposal	1,5	9,6	5,0	t
		Recovery	10,6	11,0	16,6	t
Plastic waste		Recovery	0,2	2,2	0,8	t
Paper/cardboard		Recovery	14,7	16,3	17,0	t
Scrap		Recovery	481,5	573,5	771,6	t
Municipal waste		Sorting	72,3	83,3	89,0	t
		Recovery	35,1	27,0	29,2	t
Other		Disposal	55,9	80,1	277,2	t
		Recovery	37,0	98,2	119,5	t
Total			**852,0**	**1094,1**	**1547,5**	**t**

9 Biodiversity

The AOS site is located in the industrial area of Stade-Bützfleth. The surrounding area is characterised by industrial use, the Elbe River, agricultural land and nearby settlement areas. To the south and north of the AOS site are industrial premises, including those of DOW Chemical and the currently unused premises of ETANAX. To the west of the AOS site, there are partly agricultural open spaces, mainly owned by AOS, and further away the village of Bützfleth. To the east, the site is bordered by the Elbe River.

Biodiversity and nature conservation aspects have long been considered as part of applicable permitting and environmental assessment procedures. Previous environmental assessments identified protected areas and legally protected biotopes in the wider surroundings of the site. These findings are considered within AOS's environmental management and permitting processes.

In addition, AOS has conducted a Biodiversity and Ecosystem Services Risk and Impact Assessment in accordance with the biodiversity-related requirements of the ASI Performance Standard V3.3. The assessment included desk-based research, a site visit, engagement with site management and an evaluation of the site's Area of Influence, covering the production site, the red mud basin and relevant surrounding areas. The assessment considered protected areas, habitats, potentially occurring threatened species, invasive alien species, ecosystem

services and relevant operational impact pathways. No World Heritage Sites were identified within the assessed proximity.

The assessment also considered ecosystem services that may be affected by AOS activities and their relevance for surrounding stakeholders. Based on the assessment results, existing environmental permits, operational controls and the ISO 14001-certified environmental management system, no significant impacts on biodiversity or ecosystem services were identified. Relevant findings are integrated into AOS's environmental management processes and are reviewed periodically and in the event of significant operational or regulatory changes.

Under normal operating conditions and in compliance with applicable legal and permitting requirements, no significant negative impacts on biodiversity are expected. To date, AOS has not identified any biodiversity-related incidents requiring notification or reporting.

10 Human rights

10.1 Human Rights Due Diligence and Complaints Mechanism

AOS respects internationally recognised human rights and has implemented a structured human rights due diligence process. This process includes the regular identification and assessment of actual and potential impacts, prioritisation based on severity, the implementation and monitoring of prevention and mitigation measures, appropriate communication, and access to complaints and remedy. At the Stade site, the focus is on AOS's own activities, employees, temporary agency workers, contractors, and direct impacts on the surrounding area. As a toll manufacturer and reprocessing company, AOS does not directly procure bauxite; sourcing is therefore outside AOS's direct sphere of influence. AOS considers relevant findings, and uses its influence where gaps become apparent. Concerns can be submitted via compliance@aos-stade.de.

AOS handles all submitted concerns in a confidential and structured manner. Reports are assessed by the responsible internal function, documented, and followed up according to their nature and severity. Where appropriate, preventive or corrective actions are defined and monitored until closure. AOS does not tolerate retaliation or adverse treatment against any person who raises a concern in good faith or participates in the review of a concern. Feedback is provided to the reporting person where possible and appropriate, taking into account confidentiality, data protection, and legal requirements. The complaints mechanism is available to employees, temporary agency workers, contractors, business partners, and external stakeholders who may be affected by AOS's activities.

10.2 Human Rights Policy

Introduction

This Human Rights Policy outlines the human rights standards that must be upheld by the Aluminium Oxid Stade GmbH (AOS), as well as any of its affiliates, partnerships, ventures, or other business associations that are effectively controlled by AOS, either directly or indirectly. This includes all employees, directors and individuals acting on behalf of AOS. All AOS's business partners are expected to follow the AOS Supplier Code of Conduct which outlines the

responsibilities of business partners to respect all internationally recognized human rights. All AOS's employees are expected to follow the AOS Employee Code of Conduct which outlines the responsibilities of employees and all other individuals working in and with AOS to respect all internationally recognized human rights.

AOS adheres to all applicable international and national laws in the countries where we conduct business. In instances where local legislation differs from the principles outlined in the AOS Human Rights Policy, we follow the highest standard. Where it may contradict the principles outlined in the AOS Human Rights Policy, we will comply with the legal requirements while also actively seeking ways to uphold the international standards to the greatest extent possible.

Our commitment

At AOS, we are committed to upholding all internationally recognized human rights as outlined in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including International Labour Organization's (ILO) Core Conventions, and the United Nations (UN) Declaration on the Rights of Indigenous Peoples.

To fulfil our commitment, we will adhere to the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, and undertake risk-based due diligence to identify, prevent, and address any adverse impacts on human rights that may be caused by our activities, or to which we can contribute or be linked to through the activities of our business partners. We will maintain a complaints mechanism to allow those adversely affected to raise concerns and seek remedy, as appropriate.

Our commitment extends to all individuals who may be affected by our actions and the actions of our business partners, including AOS employees, employees of our subsidiaries, local communities in which we operate, and individuals and workers along our value chain. We particularly focus on the rights and needs of vulnerable groups, such as women, children, Indigenous Peoples, and migrant workers.

We are committed to protecting the livelihoods, health, and rights of communities affected by our operations and the operations of our business partners, including their right to clean water, sanitation, land and natural resource ownership, and a safe and sustainable environment.

We respect the rights of Indigenous Peoples and take steps to ensure that our activities do not negatively impact their rights to self-determination and to their traditional lands, territories, and resources. We require that our business parents consult and cooperate in good faith with the Indigenous Peoples concerned through their own representative institutions in order to obtain their Free, Prior and Informed Consent (FPIC). We will take steps to respect cultural and sacred heritage and avoid or minimize resettlement through our value chain.

We do not tolerate retaliation against human rights defenders who are acting to address human rights on behalf of individuals or groups.

We firmly prohibit any form of forced labour, child labour or human trafficking in our operations and value chain. We respect labour rights of workers, including but not limited to health and safety, non-discrimination, no-harassment, freedom of association, collective bargaining, adequate wages and working hours.

We respect the right to privacy, including protection from surveillance and data privacy. We will ensure that our business partners' security practices respect human rights and are in line with international standards.

We recognize the connection between human rights and climate change mitigation and other environmental impacts. We support a socially inclusive, just, and rights-respecting transition to a low-carbon economy across our processing facilities and our value chain.

Finally, we acknowledge the link between human rights and issues related to unethical business behaviour. We are committed to transparency and strong governance, and do not tolerate any form of bribery, corruption, money laundering, unfair competition, and irresponsible taxation. We strive to conduct our business in the most responsible manner, following the OECD Guidelines.

Specifically, we will:

- *Identify and assess any potential or actual negative impacts on human rights that may be caused, contributed to, or directly linked to our operations, products, and services as well as business relations throughout the entire value chain.*
- *If needed, prioritize those human rights assessed as salient based on severity.*
- *Take steps to prevent or reduce any identified negative impacts on human rights, through the implementation or creation of appropriate processes.*
- *Seek to remedy or participate in the remediation of any negative impacts on human rights that our business causes or contributes to, including working with judicial or non-judicial mechanisms to provide access to remedy.*
- *Report on how we address our potential and actual impacts on human rights, without putting affected individuals at risk or compromising commercial confidentiality.*
- *Ensure that all our employees uphold respect for human rights in their daily actions and decisions, by following this Policy and the AOS Employee Code of Conduct.*
- *Hold our business partners to the same standards, by expecting them to meet their responsibility to respect human rights as stipulated in the AOS Supplier Code of Conduct.*
- *Use our influence to stop any actions or omissions by other parties directly linked to our operations, products or services that lead to negative impacts on human rights once we become aware of such impact.*

Remediation and Grievance

AOS is committed to communicating with stakeholders in a timely, effective, and transparent manner. If any adverse impacts on human rights caused by our operations are identified, we will take prompt and effective action to address them. This may include providing remedy or compensation to affected individuals or communities, and taking steps to prevent similar impacts from occurring in the future.

We commit to setting up and providing a companywide alert line for reporting concerns following the UNGPs criteria for an effective grievance mechanism.

Until then, any concerns about or violations of this policy should be reported to AOS.

Governance

The AOS Board is ultimately accountable for our human rights approach, and all AOS's employees have a role in implementing our commitments. The AOS management is responsible for overseeing the implementation of this policy in the daily operations and making decisions on related issues, such as undertaking processes for assessing and addressing human rights risks.

10.3 Anti-corruption

In 2025, there was no known or confirmed incident of corruption at AOS. No employees were dismissed or disciplined for corruption. There was no incident as a result of which contracts with business partners were terminated or not renewed due to corruption violations. Furthermore, no public court proceedings for corruption were brought against AOS or its employees during the reporting period.

10.4 Diversity and Equal Opportunity

We believe that diversity at workplace is a crucial factor in creating a healthy work environment which is conductive to innovation, engagement, and high performance as employees with different background optimally contribute with their skills and viewpoints. We focus our internal and external efforts in order to ensure that we have a diverse workforce which has gender balance and talent coming from various culture, heritage and sexual orientation. We create an inclusive environment promoting equity and enhancing cultural sensitivity among the employees.

We are an equal opportunity employer, where the recruitment is solely based on ability and merit. The opportunity to grow and be promoted to higher positions depends upon the performance and skillset development of the employee irrespective of favouritism, which enhances employee motivation and performance. We continuously review our policies and programs in order to enhance our ability to recruit, retain, engage and develop diverse talent.

10.5 Non-discrimination

Our policies help create a work environment where all the employees are free from any type of discrimination in compensation, employee benefits, opportunities, and training, based on age, gender, religion, race, sexual orientation, disability, cultural background, marital status, sex (including pregnancy), or affiliation with any union, political or religious organisation. A non-exhaustive list of some instances that are considered discriminative include

- Disproportionately disqualifying male, female or other diverse job candidates on purpose.
- Bypassing team members with specific characteristics (e-g- race) for promotion.
- Employees making sexist or racist comments disparaging someone's ethnic or sexual origin.

We provide a safe and pleasant working environment where it is strictly forbidden to harass employees verbally, physically or sexually for the above reasons. Any employee who violates these terms and indulges in discrimination and harassment will be subjected to corrective disciplinary action, which may lead to reprimand, demotion or termination of contract depending upon the severity of the offence.

Employees with concerns regarding any form discrimination or harassment at workplace are encouraged to report these issues to their supervisor, the Works Council or directly to the management. Employees are allowed to bring these issues to light without any fear of retaliation.

10.6 Freedom of Association and Collective Bargaining

At AOS, it is a standard practice to allow our employees to join a union and engage in collective bargaining for their wages. We firmly believe in providing our employees with the opportunity to negotiate their wages and advocate for their rights in a fair and transparent manner. To that end, we support our employees' decision to join a union and are proud that our team is currently represented by the IG Metall, a strong and reputable union in the industry. Our employees' wages are determined by the collective bargaining agreement with the IG Metall, which ensures fair compensation and working conditions. By offering this option and adhering to the collective bargaining agreement, we ensure that our workplace is a fair and equitable environment for all, where everyone is respected and valued.

10.7 Child Labour

We are committed to promoting and protecting the rights of all workers, including children. Child labour is strictly prohibited in Germany, and we comply with all local regulations and laws. Our policy clearly states our zero-tolerance approach and outlines the measures we take to prevent and address any instances of child labour in our operations and supply chain, including our owner company's mining operations.

We understand the importance of monitoring our suppliers and ensuring that they adhere to responsible labour practices. We conduct regular assessments and engage with our suppliers to promote ethical labour practices and address any concerns. Our employees are trained on child labour and understand their role in preventing and reporting any instances of child labour.

As a toll manufacturer, our influence on the sourcing of bauxite is limited. However, we are aware of the human rights risks, including child labour, that can exist in the sourcing of raw materials. Our owner company, DADCO, responsible for the bauxite mining operations, is currently undergoing certification with the Aluminium Stewardship Initiative (ASI) to demonstrate their commitment to responsible and sustainable practices, including addressing human rights risks in their operations. We support and encourage their efforts to adhere to best practices in responsible sourcing and will continue to monitor their progress towards ASI certification.

10.8 Forced or Compulsory Labour

We are committed in ensuring that under no circumstance we will make use of forced labour. All the employees in our company have the right to be employed voluntarily and freely, without any threat of penalty We forbid the use of violation, coercion, threat of penalties or intimidating practices. We understand our responsibility that we share with our suppliers to counter forced labour. We will not tolerate the use of forced labour by our suppliers and will not accept products or services from suppliers that engage in forced labour or similar practices.

10.9 Rights of Indigenous People

As a company located in Germany where there are no indigenous people, we are committed to respecting the rights of indigenous people in our global supply chain. We recognize that our business activities can have potential impacts on indigenous communities and their rights, and we are taking steps to assess and mitigate these risks. Our sustainability efforts include conducting due diligence on our suppliers and engaging with them to ensure that their practices align with our commitment to respect human rights, including those of indigenous peoples. We are dedicated to upholding ethical standards in all aspects of our business and working towards a more sustainable and equitable future for all.

10.10 Local Communities

We are committed to create value for all stakeholders, including the communities. As a socially responsible company, we are dedicated in generating a positive impact. It is essential to engage local communities to identify and understand their needs and challenges, which further allows us to ensure that our business activities contribute to creating a better future for local communities in which in we operate.

Examples of our commitment include supporting local fire brigades, sponsoring fundraising events, supporting local cultural events and much more.

10.11 Conflict-Affected and High-Risk Areas (CAHRA)

AOS is committed to responsible sourcing and respects internationally recognised human rights throughout its supply chain.

AOS applies a risk-based due diligence approach for raw material supply chains that may be associated with Conflict-Affected and High-Risk Areas (CAHRAs). The approach is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and forms part of AOS's broader Human Rights Due Diligence process.

AOS will not knowingly support or benefit from:

- serious human rights abuses;
- forced labour or child labour;
- torture or inhumane treatment;
- direct or indirect support to armed groups;
- unlawful conduct by public or private security forces;
- bribery or corruption;
- money laundering; or
- the non-payment of legally required taxes, fees and royalties related to mineral extraction, transport or trade.

In a five-step process AOS identifies and assesses supply chain risks through periodic reviews of relevant suppliers, sourcing regions, available audit reports, certifications, publicly available information and other credible sources. Existing and potential risks are documented, evaluated and reviewed on a regular basis.

Where risks are identified, AOS will determine and implement appropriate actions based on the nature and severity of the risk. These actions may include enhanced due diligence, supplier engagement, corrective actions, increased monitoring or escalation to management.

AOS reviews the effectiveness of its due diligence activities periodically and communicates relevant information through its sustainability reporting and other appropriate channels. Concerns related to human rights or responsible sourcing may be raised through the established compliance and grievance mechanisms.

11 Gender Equity and Women's Empowerment

AOS promotes equal opportunities and diversity across all areas of the company. Recruitment, remuneration, career development and promotion decisions are made regardless of gender and are based solely on qualifications, performance and suitability. The effectiveness of these measures is assessed annually based on gender representation within the workforce.

To support the reconciliation of work, family and personal commitments, part-time working models are available in all suitable areas of the company. AOS welcomes applications from qualified individuals regardless of gender and is committed to providing equal opportunities across all functions and levels of the organisation.

Table 13 Occupational Health and Safety Performance

Indicator	2023	2024	2025	Unit
Female employees (total)*	7,2	5,8	5,5	%
Female employees (administrative functions)	77,8	73,3	70,0	%
Female employees (production functions)	22,2	26,7	30,0	%

* including apprentices

12 Occupational Health and Safety Management System

AOS operates an occupational health and safety management system as part of its integrated management system. The system is certified according to ISO 45001 and applies to AOS's operations at the Stade site. It provides the framework for identifying occupational health and safety hazards, assessing risks, defining controls, training employees and contractors, and continuously improving occupational health and safety performance.

Employees are involved in occupational health and safety processes through established participation and consultation channels. This includes the reporting of hazards, near misses and incidents, participation in safety-related communication and training, and involvement in improvement processes where relevant. Contractors working on site are included in applicable occupational health and safety requirements and site-specific instructions.

AOS monitors occupational health and safety performance using both leading and lagging indicators. Leading indicators include training, inspections, audits and corrective actions, while lagging indicators include incident-related metrics such as the Lost Time Injury Frequency Rate (LTIFR), the Total Recordable Injury Rate (TRIR) and reportable occupational accidents. Occupational health and safety performance and the effectiveness of the management system are reported annually and reviewed regularly as part of management reviews, internal audits and the follow-up of objectives and measures.

Where required, corrective and preventive actions are defined, assigned and tracked to completion.

Table 14 Occupational Health and Safety Performance

Indicator	2023	2024	2025
LTIFR	10,20	6,10	10,82
TRIR	26,90	14,70	19,23

AOS benchmarks its occupational health and safety performance annually against relevant industry statistics published by BG RCI. The comparison is used to assess the effectiveness of the management system and to identify opportunities for continuous improvement.

Table 15 Benchmark Against Industry Practice

Reportable Occupational Accidents per 1.000 Full-Time Employees	2023	2024	2025
AOS	7,87	1,97	5,77
BG RCI Benchmark	14,74	14,46	13,22

13 IT security and data protection

At AOS, IT security is a high priority and an integral part of our sustainability strategy. We understand that robust cyber security and responsible data protection are crucial not only for the protection of our business interests, but also for the trust of our stakeholders and the long-term sustainability of our company.

Our approach to IT security is holistic and includes technical, organisational and personnel measures. We have implemented a cyber and information security framework based on recognised international standards. This framework includes:

- Regular risk assessments for all relevant projects and critical resources
- Continuous monitoring of cyber security risks
- Harmonised electronic and physical security controls
- Clear responsibilities and processes for handling sensitive data

Data protection as a priority

The protection of personal data is a top priority for us. Our data protection unit ensures compliance with all relevant data protection laws and creates a framework for data protection-compliant business activities. We attach great importance to protecting the rights of all persons whose data we process - whether they are employees, customers or business partners.

Continuous improvement

In order to keep pace with the constantly evolving threat landscape, we continuously invest in improving our IT security measures. This includes:

- Regular training and awareness-raising measures for all employees
- Use of the latest security technologies and tools
- Close cooperation with external security experts and authorities
- Continuous adaptation of our security strategy to new threats and regulatory requirements

This comprehensive and proactive approach to IT security ensures that AOS is ideally equipped for the digital challenges of the future. We do not view IT security as a cost factor, but as a strategic investment in the sustainability and future viability of our company.

14 Infringements and liabilities

At the time of publication, there are no pending legal violations and related fines, judgments, penalties or non-monetary sanctions.

15 Political influence

AOS maintains a good professional relationship with its competent authorities and relies on good dialogue and transparency. AOS did not make any payments to governments beyond legal claims during the reporting period.