



ASI disclosure document

Emergency response plan

- **Risk Control - *Having all major risks under control and be prepared for emergencies***
 - Speira proactively aims to identify and evaluate all major **HSE risks** by using systematic risk and impact assessments. This includes safety, fire, environment, health (physical, chemical and psychosocial risks) and security risks. Knowing the risks is key to decide which measures and how many controls (barriers) are necessary to prevent severe incidents.
 - A special focus lays on the **“Critical 7”**. Speira identified 7 critical safety risks with fatality potential, each with dedicated Speira HSE requirements and programs:
 - Energy Control
 - Fall prevention
 - Mobile equipment
 - Crane Safety
 - Confined space entry
 - Molten metal safety
 - Contractor management
 - At the same time, **learning from incidents** completes the risk picture and the identification of weak controls which need to be improved. This includes thorough investigations, sharing of root causes and learnings from other sites. The most serious HSE incidents are referred to as “High Risk Incidents (HRI)” and have highest attention throughout the organization.
 - Well organized and trained **emergency response** and crisis management will mitigate the severity of incidents, when risks materialize. All Speira sites as well as Speira on Corporate level have comprehensive Emergency and Crisis Management plans for scenarios related to safety, fire, security or environment. These are trained and exercised regularly.

Speira has implemented site-specific emergency response plans, which are updated regularly. These plans are open for inspection on site. For confidentiality reasons a publication is not possible. Local authorities like fire departments and permitting bodies are fully informed. For plants under the Directive 2012/18/EU of the European Parliament, a publicly available **emergency plan is published**.



Governance approach to ESG topics

We are currently working on a holistic ESG Strategy, incl. systematic (data) Governance, Roadmap and Reporting. We will base our final approach on the material topics identified through the ESRS DMA. We will publish a Sustainability Report which includes detailed information about our ESG governance structure (Q2 2025).

Material ESG topics following materiality check updated in 2024.

The Materiality assessment is currently in the process of alignment with European CSRD. For this topic, a holistic perspective was chosen including customers, suppliers, and internal stakeholders. Questionnaires have been sent out and evaluated after receipt.

Fines, sanctions, penalties, and judgements

No material fines and penalties as defined in the ASI standards for environmental breaches have occurred in 2023 for Speira plants falling under ASI certification.

Payments to governments

Speira has not performed any payments to governments in 2022, 2023 and 2024.

Emissions to air

Emission / pollutant	Amount [kg/a]
Particulates (PM10)	19.989 kg
Sulfur oxides (SOx/SO2)	621643 kg
Nitrogen oxides (NOx/NO2)	732074 kg
Total organic carbon (TOC) (as total-C or CSB)	430828 kg

All Speira sites have developed emission to air reductions plans, which are updated on a regular basis.

Discharges to water and its management

Water in our Grevenbroich site is handled via our internal industrial wastewater treatment plant. Speira operated in conformity with regulations set by the local authorities and is closely monitored. All other Speira sites discharge water through local municipal sewage systems.

Management of spills and leakages and their management

As soon as an incident occurs, action is taken using the production site-specific emergency response plans and crisis management.



Waste management and reporting

Disposal type	Category	Amount [t]
Recycled	Hazardous	129758 t
	Non-hazardous	36420 t
Other treatment	Hazardous	17818 t
	Non-hazardous	7154 t

Water assessment and management

Speira used in 2023 1.084.080 CBM of fresh water – Water stress and water scarcity for Speira sites in Germany and Norway was assessed and found to be low or very low respectively.

Speira Grevenbroich uses fresh water from wells located close to the plants. All other plants are supplied by public freshwater grid.

Biodiversity assessment and plan

A biodiversity assessment was performed on site level to assess impacts on biodiversity regularly. The result of the assessment was that Speira operations are performed in industrial areas being in use since decades. For newly in use areas as parking lot extensions, compensation measures following German environmental legislation have been performed.

Protected areas

Speira carried out an analysis on the topic of Indigenous peoples and protected areas and concluded: Speira operates on sites located in industrial parks and used for industrial production since decades. Speira is not active in protected areas.

Gender equity and women's empowerment

Speira emphasizes equality and diversity even before hiring. The career page and job postings are designed for all genders. With our standardized interview guides, our recruiting specialists ask neutral questions to make gender-independent decisions. The Code of Conduct is the main reference on how to handle gender equity within Speira. Every employee is getting this conduct in the Onboarding process. The women's network, established within the company in 2023, promotes social interaction measures, provides a space for open discussion, and implements initiatives for women. The women's network is continuously growing and currently has 128 participants. Through these measures, our proportion of female employees has increased from approximately 10.5% in 2023 to 11.8% in 2024.



Management system on OH&S

- **HSE Basics – License to operate**
 - Through an updated legal and permit requirement register, supported by specific IT tools and processes, all applicable internal and external HSE regulations are monitored, and **compliance** systematically verified.
 - In Speira, excellent **housekeeping and cleanliness** is an extremely important pre-condition for health, safety and environmental control, which is reached by defining and visualising housekeeping standards, monitoring these and assigning clear responsibilities.
 - HSE are clearly integrated into the **organization**, e.g. in SOP´s (Standard Operational Procedures), Daily Management Systems, qualification planning, onboarding processes and employee selection processes.
 - HSE management processes are implemented locally to meet the ambitions of our HSE **management system** - framed by Speira HSE standards, ISO, ASI and customer requirements. To identify gaps and improvement potential and to generate commitment, self-assessments and audits are conducted regularly.
 - Key element of excellent HSE performance is a competent and well-organized workforce. We ensure that employees at all levels have the right knowledge and expertise to complete their assigned HSE roles.

We benchmark our Safety performance within the European Aluminium Industry using the "Safety Statistics Report" from European Aluminium(EA). The last available report is from 2023 (data from 2022).

	TRI Rate European Aluminium Average 2022	TRI Rate Speira 2023	
Total (Grevenbroich, Holmestrand, Hamburg, Karmoy and Rheinwerk Neuss)	Total: 1,82	0,91	50 % better than EA average
Grevenbroich, Holmestrand, Hamburg and Karmoy	for Rolling sites: 1,0	0,78	22 % better than EA average
Rheinwerk Neuss	for Primary sites: 1,9	1,42	25% better than EA average

TRI (in number) = Total Recordable Injury = Lost Time Incident (LTI) + Restricted Work Cases + Medical Treatment Cases

TRI Rate (per 200.000 hours worked) = (TRI × 2,00,000) / Total hours worked in the year