



## American Buffalo Metals – Sustainability Report 2025

Report Plan V1.3 10/28/25

### A. INTRODUCTION

#### 1) About ABM

American Buffalo Metals, Inc. (ABM) is a privately held metal recycling company operating out of its production site in Crossville, Alabama. Founded in 2018, the company has since specialized in the recycling and reprocessing of aluminum to the highest possible specifications.

ABM commits strongly to sustainability and to working for more than just the bottom line. Our principles of honor, courage, and commitment to a job well done run through all we do and drive us toward better outcomes for our customers, for our workforce, and for our environment.

As a secondary aluminum producer, ABM contributes substantially to the circular economy in the field of non-ferrous metals through modern, efficient smelting processes. Aluminum is essential to the current and future US economy. It has been designated as a critical mineral, vital to national security and to numerous core sectors such as automotive, construction, and green energy.

Aluminum is also a key material in the transformation to a circular economy: infinitely recyclable, light, and strong. At ABM we recognize this innate value and are committed to contributing to the circulation of high-quality aluminum by working with our suppliers to capture end-of-life material, process it to specification, and thereby enable our customers to manufacture the highest quality secondary aluminum products.

Our customer base primarily consists of downstream companies in the U.S. automotive, mechanical engineering, and construction industries, which rely on stable supply chains and specification-compliant secondary aluminum. ABM produces aluminum in various forms, dependent on customer need, including sow, ingot, and cast cones (hereafter referred to only as ingots).



*Figure American Buffalo Metals, Crossville, Alabama – source: United States Map by Vemaps.com, edited*

## **2) Report Purpose**

ABM has operated for only a few years since its founding in 2018 and yet has already developed a well-founded reputation for quality and for commitment to sustainability. To ensure that we build upon this momentum, and to gain recognition for the strong ethics and performance of our business model, ABM has made the decision to apply for accreditation under the Aluminum Stewardship Initiative (ASI) Performance Standard.

ASI is a global non-profit standards setting and certification organization for the aluminum industry, aiming to collaboratively foster responsible production, sourcing and stewardship of aluminum. In gaining certification through ASI, ABM is showing commitment to the principles of transparency and continuous improvement from the cornerstone of the standards and also proving its sustainability and good governance principles to its customer base.

The creation and publishing of this report goes beyond the reasonable expectation for transparency outlined for small and medium enterprises in section five of the ASI Performance Standard, thereby representing the commitment of ABM to transparent and sustainable practices.

### **3) Report Structure**

This report will follow the framework set out by the ASI performance standard:

First, engaging with governance topics such as business integrity, policy and management, transparency, and material stewardship practices. Next it will explore ASI's engagement on environmental topics such as greenhouse gas emissions, other emissions, effluents, and waste, water stewardship, and biodiversity. Finally, social topics will be set out including human rights and workers' rights and occupational health and safety.

At some points throughout this report, reference will be made to external sources or to internal documentation and policy. External sources will be compiled in the references section toward the end of the report. Internal documentation may be made available upon request, only in cases where the provision of said document does not constitute or potentially constitute a business or data risk to ABM or any other stakeholder.

### **4) Stakeholder Engagement**

At ABM, our stakeholders form the foundation of our operations and drive our continual improvement; they ground us, and they push us further. We understand that our actions impact a diverse range of individuals and groups, including our employees, customers, suppliers, owners, and the community in which we operate.

Just as we recognize our impact on our stakeholders, we seek to empower them to have an impact on us. Our policies and practices are shaped with our stakeholders' interests in mind and, where practical, with their input. Our small size enables us to maintain direct and continual communication, supporting our commitment to transparent and ethical engagement with those impacted by our operations.

We welcome engagement and feedback, both positive and negative, from all our stakeholders in order to hold us daily to our own standards of honor, courage, and commitment to a job well done. We would like to take this opportunity to thank our stakeholders for their input and their trust as we continue our production of sustainable and responsible secondary aluminum.

Having run an analysis of possible stakeholders, we have created the following list of groups and individuals whose needs, wants, and advice should be investigated, and to whom we have a burden of responsibility in our business operations:

Internal:

Owner / Company Leadership, Plant Management, Administration & HR Teams, Operations & Maintenance Teams, Quality, Health, Safety & Environmental (HSE) Officers, Finance & Procurement, Shipping & Receiving Teams, All Other Employees, Contractors, and On-Site Third Parties.

External:

Local Government & Regulatory Agencies, Utility Providers, Suppliers & Contractors, Customers, Local Community, Emergency Services, Environmental Advocacy Groups, Investors and Finance Providers, Legal Advisors, Innovation Partners, Industry Associations,

Labor Unions, Economic Development Agencies, Local Media, Sustainability and Other Certification Bodies, The Local Environment.

Each action we take has an impact and each impact affects different stakeholders in different ways. Our commitment is to minimize our negative impact and maximize any benefits in all our stakeholder interactions.

## **5) Leadership Statement**

It is with feelings of great pride that I present ABM’s inaugural sustainability report. At ABM, sustainability is more than an aspiration—it is the foundation and driving force of our daily operations. As a small business rooted in the heart of our local community, we recognize both the responsibility and the opportunity we have to advance environmental stewardship, circularity, and social progress within the US aluminum industry.

Our employees are the bedrock of our operations; I can only extend my deep thanks to the high standards they show each and every day. In turn, ABM is committed to ensuring a safe and engaging workplace, looking after their best interests, and coming together to provide our customers with the best possible service.

At ABM, we strive to operate with integrity, safety, and deep respect for the communities we serve. Our focus remains on delivering high-quality, sustainable materials while maintaining the highest standards of environmental and social responsibility. This report contributes strongly to our commitment to transparency in these aims, setting straight the standards we strive for and the levels we currently achieve.

Looking ahead, we remain fully committed to advancing sustainable business practices. While we recognize the challenges before us, we are confident that our collective efforts will drive progress toward a more sustainable future. Our dedication to innovation, transparency, and ethical governance will guide us every step of the way.

*Michael Lee*

## GOVERNANCE

### **Business Integrity**

#### Legal Compliance

ABM is committed to full compliance with all applicable legal and regulatory requirements. This includes federal, state, and local laws of the area in which ABM operates. Legal compliance is a foundational element of our corporate governance structure and a core principle guiding our business conduct.

ABM complies with laws and regulations in environmental protection, occupational health and safety and corporate governance and business conduct. ABM maintains an up-to-date internal

Compliance Register to ensure we are always aware of regulatory developments and ready to make changes.

Due to our small size, we do not have a dedicated legal or regulatory department, instead, for each obligation an internal person is assigned as responsible to track any changes and ensure compliance with our Quality & Environmental Manager holding ultimate responsibility. Where necessary, we engage with independent advisors to ensure compliance with contracts, environmental law, labor law, and permits.

In case of non-compliance or regulatory findings, ABM has a plan to initiate Corrective and Preventive Actions, root cause analyses would be performed, and progress is to be tracked until full resolution. For environmental non-compliance this happens according to environmental Out-of-Compliance regulation from ADEM/EPA. Due to our close attention to these matters, we are proud to announce that during the reporting period there have been no instances of non-compliance resulting in fines, judgements, or penalties

ABM provides regular training to relevant employees on compliance topics, including Environmental permit requirements, Code of Conduct and Occupational Health and Safety procedures. Training records are retained.

#### Anti-Corruption and Bribery

ABM has a zero-tolerance policy toward bribery, corruption, and facilitation payments. Anti-Corruption and Bribery principles are embedded within the company's Code of Conduct, which applies to all employees, directors, officers, contractors, and third-party intermediaries.

To operationalize its anti-corruption commitments, ABM has implemented measures like training, a whistleblower mechanism, rules for gifts and hospitality and events arranged by customers or other business partners, anti-money laundering regulation, internal financial and operational controls and internal audits. Our commitment to anti-corruption and anti-bribery is also outlined in ABM's Anti-Corruption Policy.

ABM is proud to walk the walk as well as talk the talk and has not been subject to any regulatory fines or legal actions related to corruption, bribery, or unethical business practices since the founding of the company.

#### Code of Conduct

As part of ABM's commitment to good governance, we have this year established a comprehensive Code of Conduct to set out our responsibilities and expectations in a clear and concise manner. This document outlines ABM's commitment to operate in accordance with responsible, ethical, and sound business principles and in compliance with all applicable laws and regulations. It sets out how ABM does business responsibly and with dedication, living up to principles of honor, courage, and commitment to a job well done. The company supports state, federal, and international standards on human rights, labor conditions, the environment, and anti-corruption.

The Code of Conduct reflects values and commitments in areas like non-discrimination, human rights and fair work, healthy and safe work, the environment, conflicts of interest, anti-corruption and bribery, and our whistleblowing process.

The Code of Conduct applies to all employees. Completion of CoC training is mandatory for new hires and is repeated when updates occur, with mandatory review at least every 5 years. HR is responsible for ensuring that every manager distributes the Code of Conduct to subordinates and that debriefs are conducted. Regular CoC reviews are set every 5 years or whenever inciting events occur. Changes are approved by upper management. ABM expects business partners to align with our ethical principles and reserves the right to audit or terminate relationships in case of serious breaches.

### Whistleblowing

ABM is committed to maintaining an ethical work environment where concerns about suspected misconduct, unethical behavior, or legal non-compliance can be raised safely and confidentially. The company recognizes that effective whistleblower mechanisms are essential to supporting a culture of integrity, accountability, and transparency.

Our employees are provided with a formalized complaint process flow, which lays out that employees and stakeholders are encouraged to report concerns via anonymous whistleblower hotline, direct supervisor, or HR. Environmental concerns can also be reported internally, but we also encourage that the ADEM whistleblowing hotline, found on their website, be used.

ABM ensures that all reports are treated with strict confidentiality. The company enforces a strict non-retaliation policy. Reported concerns are reviewed and investigated. Corrective actions are applied, documented and tracked until resolution.

The whistleblower system can be used to report suspected corruption or bribery, environmental violations, discrimination or harassment, fraud, theft, or embezzlement, workplace health and safety violations and human rights abuses or labor standard violations.

## **Policy and Management**

### Environmental Policy

ABM has adopted an integrated Environmental, Social, and Governance (ESG) Policy that demonstrates the company's commitment to sustainable development, ethical operations, and compliance with the ASI Performance Standard. As a secondary aluminum processor, ABM recognizes its responsibility to minimize environmental impacts, uphold human rights, and ensure transparent and accountable governance. The policy is approved by the CEO, and senior management ensures the provision of appropriate resources for its implementation.

The environmental area of the policy focuses on reducing GHG emissions and energy use, increasing energy efficiency, promoting effective waste management and minimizing landfill waste, managing water responsibly, and preventing pollution. Many of these topics are elaborated on in more detail in stand-alone supplemental policies, for example our waste management policy.

The area of social responsibility focuses on respect of human rights (incl. rights of communities and Indigenous People) and labor standards, ensuring safe, fair, and inclusive workplaces,

engaging with workers and local communities, and promoting health and safety proactively. We are an equal opportunities employer and work hard.

The governance area of the policy focuses on operating ethically and transparently, complying with legal and ASI requirements, identifying and managing ESG risk, assignment of ESG responsibilities and reporting of performance.

Our ESG Policy is freely available, being published internally and externally. ABM is committed to setting measurable ESG goals and tracking performance, training employees on sustainability and ethical practices, participating in ASI audits and certification processes, and reviewing and updating the ESG policy regularly, at a minimum every five years, to reflect evolving standards and expectations.

### Leadership

ABM's executive leadership demonstrates clear accountability for implementing the company's ESG Policy and meeting the requirements of the ASI Performance Standard. Sustainability performance is embedded in the company's governance structure and linked to both strategic decision-making and day-to-day operations.

The CEO is ultimately responsible for ESG performance and ASI conformance. He ensures that needed resources are available and designated.

The Quality & Environmental Manager is responsible for legal compliance, human rights in the supply chain, environmental and social management systems, and responsible sourcing policy. He is first point of contact for ESG topics day to day and is responsible for the practical side of attaining and retaining outside certification, such as through the ASI.

VP of Finance is responsible for anti-corruption compliance. HR is responsible for policy management/Code of Conduct, HR complaints and CoC training.

### Environmental and Social Management Systems

ABM has endeavored to develop an effective Environmental Management System (EMS) and Social Management System (SMS) in order to best uphold our own expectations for material stewardship, environmental responsibility, and commitment to stakeholder protection. In order to operate an EMS of reasonable quality, we have followed the guidance of the ISO14001 standard, though have not had our EMS formally accredited. To operate a SMS, we have likewise leant upon the guidance of ISO 26000, again unaccredited.

Our EMS is a structured framework that helps us identify, manage, monitor, and improve our environmental performance in a cycle of continual improvement. The main goal of our EMS is to ensure that we minimize negative impact on the environment, comply with relevant regulations, and achieve continual improvement.

Our senior management have established an environmental policy, proving engagement throughout our company. This policy fits the context of our operations and local regulations and guides our actions across all business areas. We have run a materiality analysis to highlight risk areas for both our business and our value chain, enabling us to focus our efforts and resources on the issues that really matter to us. Objectives and aspirations have been set, and plans

made toward their achievement, in many cases changes and controls have already been put into place. Responsible persons have been assigned to specific issue groups, and resources allocated. Review and improvement are enshrined in our controls, to assess effectiveness and reassess relevance as time and operational methods change, enabling an ever-stronger foundation for sustainable business growth.

We have identified a list of stakeholders involved in and impacted by our operations and made commitment to each of them to act responsibly, with transparency, and with honor. Our company leadership has overseen a renewal of our company CoC, expanding and deepening the commitments within. We have made explicit commitments to uphold human rights and labor laws, to combat discrimination and harassment, and to operate fairly and transparently in relation to anti-corruption, anti-bribery, and political involvement. We uphold strong ethical practices in our engagement with both suppliers and customers, holding that trust is earned and maintained rather than given. Each of our commitments has checks and balances in place to ensure that these are not just empty words but shape the way in which we do business each and every day.

#### Responsible Sourcing Policy

At ABM, prioritize sourcing quality materials and services responsibly, ensuring that our supply chain upholds the standards of environmental stewardship, quality, and ethical conduct we expect of our own operations. We pre-check suppliers to align their operations with our environmental responsibility standards, based upon our internal ASI-based framework, as well as our quality management system standards. Our sourcing practices adhere to all applicable Alabama state laws and federal regulations.

We also maintain a Supplier Code of Conduct (SCoC) that outlines our expectations for legal compliance, labor practices, and environmental impact. Additionally, we do not source from countries or entities listed on any applicable restricted or sanctioned lists. As part of ABM's commitment to responsible sourcing and alignment with the ASI Performance Standard V3.2, we apply a risk-based due diligence approach to evaluate the origin of materials within our supply chain. This includes assessing whether suppliers source from regions identified as conflict-affected or high-risk (CAHRAs), in accordance with the OECD Due Diligence Guidance. ABM references the publicly available list of Conflict-Affected and High-Risk Areas (CAHRAs) at [www.cahrastlist.net](http://www.cahrastlist.net) to support our risk-based due diligence and responsible sourcing practices in alignment with OECD and ASI standards.

Where risks of contributing to armed conflict, human rights abuses, or unethical practices are identified and cannot be reasonably mitigated, ABM practices strategic avoidance. This means we may choose not to engage with suppliers sourcing from certain regions or entities, even if the material itself is not restricted, in order to uphold our ethical standards and stakeholder trust.

This approach is proportionate to our size and resources and is designed to foster a resilient and transparent supply chain. All decisions are documented, reviewed periodically, and disclosed as part of our sustainability reporting.

We perform supplier evaluations to ensure alignment with our values and performance expectations. This includes initial assessments, ongoing monitoring, and performance tracking. Although, as a small company ourselves, we understand the barriers some of our suppliers face in applying best practice in upholding ESG standards, we require our suppliers to demonstrate transparency, continuous improvement, and accountability. By holding our partners to these standards, we aim to foster a resilient, ethical, and sustainable supply chain that supports our long-term business goals and stakeholder trust.

ABM is committed to strengthening supplier relationships based on shared values and long-term collaboration, and engaging suppliers on improvement plans where gaps are identified. We believe that the best quality product stems from high quality business relationships and business standards, all the way through the value chain.

The responsible sourcing policy is publicly disclosed and reviewed and updated at least every 5 years or on any changes to the business or on any indication of a control gap.

#### Environmental and Social Impact Assessments

ABM takes due process seriously and understands that change needs to be managed in order to avoid unintended negative consequences to stakeholders and the environment. As such we have made the commitment to initiate in-depth environmental, social, governance, and human Rights risk and impact assessments in advance of any decision to significantly expand or move our business.

Although we have no current or short-term plan to expand or move our business, we have nonetheless recently run a materiality and risk analysis of our operations, following the Global Reporting Initiative (GRI) standards. We have done this in order to better understand the impact and financial risks certain environmental, social, and governance topics may have on our business, and in order to better plan avoidance and mitigation strategies. This analysis highlighted the following topics as material to our own operations: adaptation to and mitigation of climate change, energy use, air pollution, stakeholder data protection and access to high quality information. These are therefore the topics that would be given most attention to in an environmental, social, or human rights impact assessment.

#### Emergency Response Planning

ABM recognizes that environmental, technological, and social disruptions can have significant consequences for operations, workers, communities, and the environment. To minimize such risks, the company maintains a series of emergency response plans that take into account all potentially impacted stakeholders. These procedures are developed in collaboration with internal stakeholders and apply to all persons, including visitors and contractors working on ABM property.

The response plan covers evacuation and emergency action procedures for a multitude of potential risk events, each of which has been identified through standard risk analysis process. Further it includes a list of additional risks not requiring full emergency action plans, which have been identified for the facility with corresponding mitigation actions.

Clear responsibilities are assigned for different roles, covering all relevant aspects including emergency equipment, training, drills, and communication to relevant stakeholders. The procedure is annually reviewed, updated as needed and publicly disclosed.

#### Suspended Operations

As part of a business contingency plan ABM has recently established procedures to follow in the event of a temporary suspension of operations in order to minimize downtime, protect employees and assets, protect the local environment, maintain stakeholder trust, minimize re-start costs, learning and process improvement. As potential triggers that might cause a temporary suspension the company has identified natural disasters, utility outages, equipment failure, staffing shortage, industrial action, supply chain disruption, supplier failure, cyber-attack and IT failure.

Key suspension management measures focus on emergency response, stakeholder communication, environmental safeguards, facility stand-by preparation, implementation of mitigation strategies, and regulatory and legal aspects.

The suspended operations plan is reassessed at least every five years, upon significant operations changes, or upon review of an incident or event that suggests that an update is necessary.

#### Mergers and Acquisitions

ABM is a forward-looking company, just as we are engaged in making our own operations as sustainable and ethical, we want to ensure that future business decisions do not derail our progress. As such we have recently adopted a documented and regularly reviewed Mergers and Acquisitions (M&A) Plan. This plan ensures ESG integrity, business continuity, and stakeholder trust throughout any M&A process. This plan is embedded in the company's business contingency plan and aligned with ASI, ISO, and other applicable standards.

Objectives include minimizing disruption, protecting employee rights, upholding environmental and human rights standards, and maintaining conformity with ASI requirements whether acquiring, merging with, or being acquired by other players in this space.

Due diligence processes cover legal, financial, environmental, and social aspects – supported by third-party audits where necessary. This includes reviewing liabilities, contracts, and the target entity's value chain for human rights and environmental risks.

Stakeholder engagement is structured and transparent: ABM identifies impacted stakeholders, communicates early with employees and unions, and informs customers, suppliers, authorities, and certification bodies. Where appropriate, stakeholder forums may be used for consultation and consent.

A post-merger integration plan ensures that acquired entities align with ABM's ESG framework and ASI requirements.

ABM discloses material ownership changes and informs stakeholders about related impacts and mitigation measures. The M&A plan is reviewed every five years or in response to significant events.

## Closure, Decommissioning and Divestment

We at ABM are proud of the company that we have built, and are always looking for opportunities to improve, grow, and provide ever higher quality of service. Nonetheless, we also pride ourselves on being responsible and planning for all occasions. As such, we have recently developed a closure, decommissioning, and divestment plan to ensure best practice and best care in the event that we halt operations. Our priority here is to act honorably toward our stakeholders and environment, in line with company culture.

ABM maintains a documented and regularly reviewed plan to manage company closure and divestments in a responsible, legally compliant, and ethical manner. Triggers include insolvency, regulatory enforcement, or strategic withdrawal. The plan outlines measures to protect employees through advanced notice, severance, and transition support, to address environmental risks via site assessments, remediation, and land restoration where required, and to dispose of assets in line with circular economy principles, including secure handling of data and intellectual property.

Community engagement is ensured through open and transparent communication during the closure process. Financial provisions are made to cover all legal and operational obligations. All closure-related activities are documented and reported in accordance with legal and stakeholder expectations.

The plan is reviewed at least every five years or in response to significant events.

## Transparency

Transparency creates trust, this is why ABM is taking an ever more proactive and open approach to goal setting, reporting, and community engagement. We are proud of our operations and achievements and back ourselves in doing things the right way, it is only right therefore that we openly show that this is the case.

### a) Reporting

This inaugural sustainability report is the first step in the new normal for ABM. We have committed, in line with the ASI standards, to producing annual reports on our sustainability progress. These reports will be available without cost to any stakeholder or interested party.

In following the guidance given by the Global Reporting Initiative reporting standards and structuring the report in a format compliant with the ASI standards, we go above and beyond reasonable expectations for a company of our size.

### b) Public Disclosure of non-compliance

Transparency means proving that you are doing good work but also taking open and clear responsibility when mistakes are made. ABM has always held itself to a high standard in its open communication with suppliers and customers, particularly in relation to product quality. We also commit to open disclosure of any non-compliance; be it a governance failure, social due diligence mistake, or an event with environmental consequences, our incident report strategies all determine fast, open, and clear communication with effected stakeholders and

authorities. We are confident in our people and in our systems and are proud to state once more that there have been zero of these events in the past year.

c) Payment to Authorities and Government

ABM, as a proud American and Alabaman company, believes strongly in transparency and clarity in relation to payments to authority. We apply all relevant US and state law to our interactions with authorities, and we avoid donations or payment in kind to any political or administrative authority.

If this policy changes in the future, we commit to full and public disclosure, both of the decision to change policy and any payments. In this, we would comply fully with both Federal and state law on the matter.

d) Stakeholder Engagement

We welcome input from stakeholders in our drive to always, in all ways, be better. As such, we have developed a detailed series of grievance management procedures, fit for purpose dependent on the compliant source, topic, and severity. Our aim is always to engage with issue early on, directly, and with the appropriate atmosphere of respect in order to limit the opportunity for escalation and the possibility of disruption. For us, the end point of a grievance procedure is equitable resolution and process improvement.

Internally, we enshrine our commitment to fairness and dignity, as well as our expectations that everyone speak up, in our CoC. We provide grievance channels both involving and bypassing HR and line management, so that everyone feels secure that their case is taken seriously. We also engage in regular employee feedback sessions where potential issues can be raised early in a judgement-free environment.

Externally, our customers and suppliers both have clear points of contact and responsible chains of command at their disposal to quickly escalate any grievance and get the correct result. Customer and supplier relationships are critical to us here at ABM, so every interaction is treated with full respect.

We welcome input, both positive and negative, from our other external stakeholders, particularly those in the local community. We encourage direct contact via our complaints and grievances inbox and, equally, support any public whistleblowing of environmental issues via the ADEM whistleblower service. Complaints and grievances are taken seriously, with the internal handling of such complaints being documented and outcomes made available.

2) Material Stewardship

Responsible material stewardship is at the heart of what we do here at ABM, secondary aluminum production is fundamentally based in the idea of holding oneself responsible for the things we make and the way we dispose of them. We take a life cycle perspective in relation to aluminum production, and we promote resource efficiency, always looking to improve our operations and lower our impact. Whether it be energy and water use, responsible sourcing, or

efficient and effective processing methods, we are a low-impact company, looking to get even better.

a) Material Flows/ LCA

Following several years of secondary aluminum production, where we have settled our production methods and achieved sustained efficiency gains, we felt the time was right to produce a third-party Environmental Product Declaration (EPD) for our secondary aluminum products. This EPD, produced in 2025 in accordance with ISO 14025:2006 and ISO 21930:2017 by Labeling Sustainability clearly sets out and presents the manufacturing process, inputs, and impact of our key products of secondary aluminum sow, ingots, and cast cones.

This study represents the production data for 12 months from February 14, 2024, to February 14, 2025, and confirms the comparative advantages of secondary aluminum, showing highly competitive CO<sub>2</sub>e emissions and other impacts in comparison to primary material. It also confirms ABM's hard work and prioritization of sustainability, showing that the care and attention we give to our on-site operations significantly contribute to lower emissions. Selected details are found in the environmental section of this report and the EPD report in full is available freely on request.

b) Product Design

Our product is our pride, we at ABM hold ourselves to the highest standards and the same is true for our product. There can be no doubt that quality and sustainability are non-negotiable when we design and produce our secondary aluminum. Our commitment to using 100% secondary aluminum from end-of-life situations, producing high-quality products to customer specifications, and retaining the shortest feasible transportation links in our value chain all comes together to enable a well-designed and sustainable aluminum end-product.

Far from being content with this, we are engaged every day in finding solutions, improving quality, and further reducing our product's impact. We follow technological and best-practice developments in the industry closely, encourage innovation internally, and commit ourselves to improvement-focused standards such as the ASI standard.

c) Waste Minimization / Scrap Processing

Our entire operation is predicated on the return of material that has been discarded back into the economy as premier secondary material. In our own processes, we focus on effective and efficient material reclamation to ensure that waste is minimized and, where possible, repurposed. Our normal operating procedures include provision for the reintegration of any scrap aluminum produced to be assessed, prepared, and returned to the production process. In this way, we ensure near zero waste of aluminum in our operations.

Dross is an inevitable by-product of our aluminum recycling process. Here at ABM, dross is efficiently managed through outsourcing. Due to limitations in our current operational set-up, dross recovery and reuse is not possible on-site. Therefore, dross is sent to a specialized processor to recover useful materials and responsibly dispose of materials with no commercial use.

Additionally, to this, small amounts of non-metallic commercial waste, for example electronics, paper, and packaging, are generated by our operations. These are covered in more detail in the waste management section of this report.

d) Product Stewardship/ End of Life

As a comparatively small supplier to the aluminum manufacturing industry, ABM has limited control over the end-of-life of its products. Naturally, as a producer that sources 100% of its incoming aluminum from end-of-life sources, our operation helps to increase the demand for adequate waste sorting and collection – it is in our interests to see aluminum recycling rates increase, and we work closely with our supplier to ensure maximum returns and boost circularity.

We are strongly supportive of any developments that make the reliable sourcing of usable, trackable end-of-life aluminum easier.

A. ENVIRONMENT

1) GHG Emissions

a) Background

Companies such as ABM play a vital role in reducing greenhouse gas (GHG) emissions. The manufacturing sector is responsible for a significant share—up to nearly 30% of global GHG emissions—mainly due to its heavy reliance on fossil fuels for energy and raw material processing.

Recycled, or secondary, aluminum requires approximately 95% less energy to produce in comparison with primary aluminum created from mining and smelting, with an approximate equivalent reduction of 95% in greenhouse gas (GHG) emissions.

Nonetheless, ABM is aware that its operations contributes to the global problem of climate change.

## b) Methodology

GHG emissions are expressed in CO<sub>2</sub>-equivalent (CO<sub>2</sub>e) and separated into Scope 1,2, and 3, as is standard practice in GHG accounting.

Scope 1: Direct emissions from sources owned and operated by ABM

Scope 2: Indirect emissions from the generation of purchased electricity, steam, heat, or cooling consumed by ABM, but produced elsewhere.

Scope 3: Other indirect emissions across the value chain, including emissions from suppliers, logistics, product use, and end-of-life treatment.

ABM's calculation of GHG emissions follows the Greenhouse Gas Protocol calculation methodology and utilizes the UK Department of Environment, Food, and Rural Affairs (DEFRA) 2024 emission factors as well as confirmed materials volumes from ABM's annual records. The results are summarized in the following section.

The reporting period is the calendar year 2024.

As this report is the first published by ABM, and the company itself is only a few years old, historical data is not available for comparison.

## c) Emissions Data and Conclusions

As ABM produces aluminum from reclaimed and recycled sources, our upstream Scope 3 emissions are extremely low compared to production of primary material. The use of recycled aluminum significantly reduces the need for energy-intensive processes associated with primary aluminum production, thereby lowering associated emissions.

Nonetheless, Scope 3 represents over 98% of ABM's annual emissions over the reporting period. Calculated using the industry standard Greenhouse Gas Protocol methodology, the total emissions for 2024 was 16900.5 t CO<sub>2</sub>e. primarily is attributable to the value chain emissions of sourcing aluminum scrap. A more detailed breakdown of emissions generating activities for each scope follows and is visualized in Figure 1:

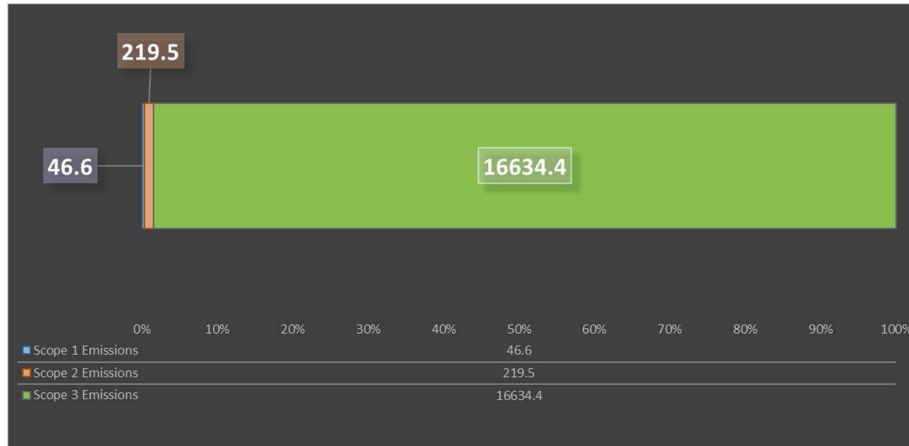


Figure 1 ABM 2024 Co2e emissions by scope

For ABM, the majority of scope 1 emissions are generated by the burning of natural gas in our scrap processing activities, resulting in scope 1 emissions of 46.6 t CO<sub>2</sub>e. As the core business activity, there is little scope for a reduction in the volume of gas used as we see demand for our products increasing. Our progress toward sustainability goals is therefore dependent on increasing efficiency in gas use, reducing waste, and reducing emissions from supplementary activities such as our on-site fleet.

Scope 2 is generated fully by the supply of electricity to company facilities; this emissions source accounts for 219.5 t CO<sub>2</sub>e and is attributable to the fossil fuels-heavy energy mix available in our area of operation.

Scope 3 is the most difficult for companies of ABM’s size to reliably calculate, but our investigations have shown that purchased goods and services are the key emitting activities, with end-of-life material disposal, and transportation of goods to and from the worksite also contributing. In total, scope 3 emissions for the year 2024 were 16634.4 t CO<sub>2</sub>e.

d) Energy

One significant advantage of secondary aluminum production, in comparison to use of primary material, is the considerable reduction in energy consumption – up to 95% lower. Even so, there is a need for electrical energy input in order to operate a smelting worksite. ABM, as a small business, sources 100% of its electricity from the local grid supplier. In the period February 2024-February 2025 our energy usage from grid came to 577280 kWh. The grid mix in our region is only partially renewable, so electrical energy use contributes to our total CO<sub>2</sub>e emissions through scope 2.

A second significant source of energy for us is the natural gas used directly in our furnaces, a scope one emissions source. Over the same period, we used 56196 MMBtu of natural gas.

Finally, we operate several vehicles onsite, all of which are powered by diesel. The use of these vehicles contributes a combined resource use of 9409 gallons of diesel fuel.

a) Smelter GHG Emissions Intensity

Global average Aluminum Smelter Mine to Metal emissions intensity is around 17 t CO<sub>2</sub>e/t, and as part of our adherence to the ASI standards we are necessitated to remain under an intensity of 11.0 t CO<sub>2</sub>e/t.

According to our calculations, based on 2024 emissions and production values, and calculated through the ASI Entity GHG Pathway toolkit, our Aluminum Smelter Mine to Metal emissions intensity is 0.55 t CO<sub>2</sub>e/t and thus exceeding the expectations of the ASI standard.

The reason for this low value is overwhelmingly down to our 100% use of scrap aluminum, removing the vast majority of upstream emissions. This justifies our decision to base our operations on aluminum reclamation and reprocessing, a future-oriented and low-emissions business model that produces high-quality results.

b) Reduction Planning

We at ABM follow the science of climate change and recognize the urgent need to reduce carbon emissions in line with the expectations of the Paris agreement. Although our emissions are low for a company operating in this space, we are continually exploring opportunities to improve energy and reduce our impact.

In line with the ASI standards, we have set a GHG emissions reduction pathway consistent with a 1.5°C warming scenario and consisting of short-, mid-, and long-term objectives. This pathway is a living guidance document, it is reviewed every year for progress toward aims and for the relevance and ambition of the aims themselves.

As demonstrated in figure 2, our comparatively efficient starting point at the baseline year of 2024 means that our short-term aim for emissions factor reduction resolves to a ten percent reduction by 2029. This would set our productive activity emissions factor at 0.5, in line with the majority of secondary aluminum processors in the US. To achieve this, consistent and continual improvement of our smelting processes and technology will be undertaken.

Our mid-term, 10 year, goal is a reduction from baseline values of twenty percent, resulting in an emissions factor of 0.4t CO<sub>2</sub>e/t and matching the most efficient small- to mid-scale operations in North America. To achieve this goal, like these competitors, we will need to look to renewable energy and reduce our reliance of gas as a primary energy source for our furnaces.

Our long term, 20 year, goal is to achieve an emissions factor of 0.15 CO<sub>2</sub>e/t. This constitutes an emissions reduction of almost 73% verses our baseline values and would set us among the world's most efficient and sustainable aluminum producers. Currently only extremely large organizations such as Novelis and Real Alloy have achieved emissions factors in this range, and then only for parts of their larger operations. Achieving this would set us close to the low-point emissions factor of 0.1 stated by the International Aluminum Institute. Achieving this would require full integration of circularity principles, green electrification of all possible processes, and application of the most efficient remelting processes possible.

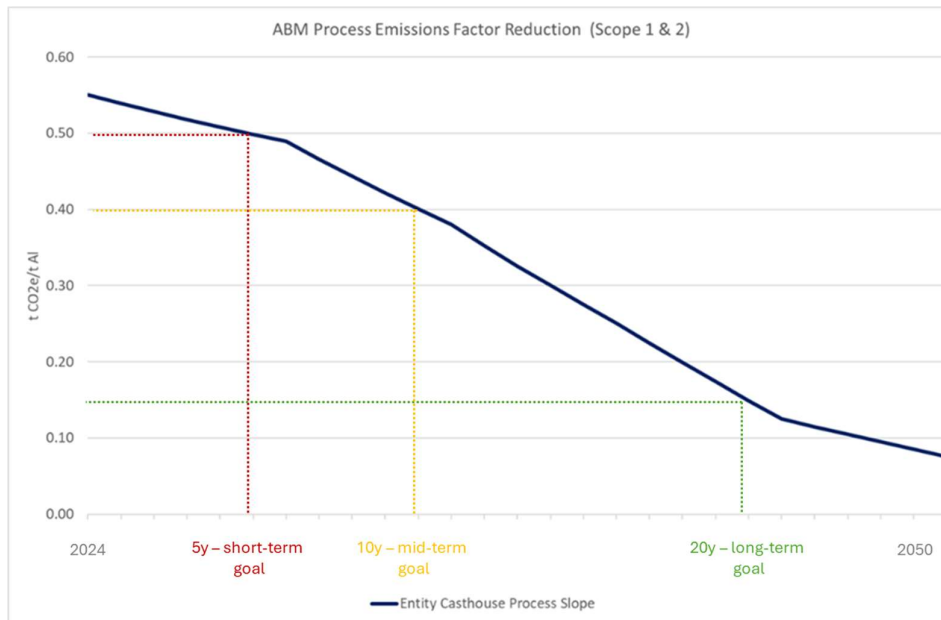


Figure 2 Carbon reduction pathway

Emissions factors only tell one side of the story, emissions must also be studied in relation to their net creation. With expectations being for an increase in productivity and therefore also an increase in gas use, a real reduction in our net scope 1 emissions in the short term will be difficult to achieve. As such, efficiency is the key to our carbon reduction strategy in scope 1. In the short term, we are engaged in the process of optimizing burner and furnace operations for maximum efficiency. This includes installing emissions monitoring equipment for the first time to more accurately track our emissions, optimizing combustion control and insulation, and installing a custom environmentally friendly combustion unit to recycle hot air. Our estimates, developed through third party consultation, are that this capital investment could decrease gas consumption and the resulting emissions significantly from our current operations.

In addition to this, we will begin exploring the feasibility of some fundamental changes to how we operate the furnace, for example, introducing a small amount of biogas or other similar lower carbon intensity fuel into our furnace mix. We do not commit to any significant changes at this point but recognize that learning what is possible is the first step in making progress.

In the medium term, we have ambition to make substantial reductions in our operational emissions. We will give more attention to fuel mix, with a focus on low emissions fuels such as hydrogen, as well staying aligned with emerging technologies and exploring new systems for waste heat recovery or carbon capture with the aim of implementing those options when they reach viability. Equally, we will keep up to date with the options to replace any fossil fuel burning vehicles used on site with electric alternatives.

In the long term, we commit to keeping abreast of technological changes that can reduce our CO<sub>2</sub>e emissions, with the aim to reduce these to effectively zero. The most likely of these is a fuels source switch to hydrogen or electrification of the furnace once the technologies become feasible. In the long term we also expect technologies such as carbon capture to come to

fruition and would consider also using carbon offsets to balance any impact we are not able to remove.

Our scope 2 emissions come purely from the electric mix available to use via commercial suppliers in our state. These include significant amounts of fossil fuels. ABM is not currently in a position where we can generate significant amounts of power on site, nor can we impact the operational behavior of our energy supplier. Again, we must therefore focus on efficiency and on knowledge building in the short term.

Our first knowledge-based action will be to further research alternative suppliers in our region that provide a greater amount of energy from renewable sources. Currently we have not found an alternative supplier, but as interest in this space grows, we anticipate more competition. As soon as fossil fuel-lite or fossil fuel-free energy is available we will consider the switch.

In terms of efficiency, we commit to an energy audit of all electrical products, both operational and supportive, to see where upgrades are needed to lower electricity use. We will investigate the implementation of smart controls, for example smart lighting, that automatically lower our electricity needs and will also run informative training for our staff that highlights the need for efficiency in electricity use.

Mid-term, we will investigate the option of limited on-site generation of green energy. At present the site size and layout, current technology, and upfront cost come together to make self-generation unfeasible, but this situation can be expected to change. We will hold an annual review of the possibility of on-site generation and run business analysis as soon as feasible. Additionally, we will aim to fine tune the short-term commitments through a process of continual improvement.

Long-term, electrification of our plant is a strong aim, which goes hand in hand with increased self-generation capacity. We will also look into local cooperation with other businesses, local stakeholders, and the local community to push for greener energy generation in our local area.

Scope three is the most difficult to engage with for a small business such as ABM, nonetheless there are some key areas we can look to further reduce our company's impact. In the short term we can look upstream and downstream to make changes. We have recently strengthened our supplier Code of Conduct, increasing the scrutiny of the environmental performance of our upstream value chain. It is imperative that we work closely with our key suppliers to help them understand the importance and best practice for emissions reduction.

Downstream, waste generation and disposal is a key area that needs to improve. In the short term we will investigate the options available to us in regard to increasing recycling and waste energy reclamation. Our aim will be to avoid our waste entering landfill entirely. Initial research has been relatively unsuccessful, but we are confident that a solution can be found. In general, we will also reassess the waste generation occurring from normal business practices – if waste is not generated then it does not require responsible disposal. Our waste generation is not particularly high, but with stronger controls, better training, and a shared commitment to efficiency, we expect significant reduction in generated waste.

In the medium term, we will continue to strengthen our supplier engagement to continually improve sustainability standards. We will also investigate opportunities for lower-emission

transportation, be that biofuel and hybrid freight or, where possible, integrating rail freight. As we continue to strengthen our supplier network, we will give sustainability concerns ever more weighting in supplier sourcing decisions.

Internally, we will continue to seek to reduce waste where we can and investigate any opportunities for internal reuse and recycling. This will involve much more structured material sorting and disposal procedures, for which both resources and training will be required. Our continual review of waste removal services will enable us to ensure we are always responsibly disposing of our waste in the least impactful manner.

In the long term we are seeking to increase the circularity of our operations. Secondary aluminum is already a circular product, but as a company operating in the reclamation process, we are aware that the loop between end-of-life and reentry into the economy is not working as effectively as it should. Too much aluminum still drops out of the circular value chain. Not only would higher recycling rates benefit our business, making sourcing far easier, but it would significantly improve the environmental impact of our industry. For this reason, our long-term strategy will involve supporting improved waste reclamation strategies in our state, and public education in relation to aluminum recycling.

## 2) Emissions, Effluents, and Waste

### a) Emissions to air

In addition to GHGs, processing scrap aluminum into high quality ingots necessarily results in the emission of other potentially harmful pollutants to the air. Emissions primarily occur from the operation of the furnace, but also during other activities such as goods transportation and maintenance, and can include substances that are potentially harmful to human health and to the environment if not managed appropriately. Common emissions from the aluminum industry include:

Particulate Matter (PM): Emitted during the melting and handling of materials.

Volatile Organic Compounds (VOCs): Generated from the thermal treatment of organic coatings on materials.

Nitrogen Oxides (NOx): Produced from the combustion of natural gas in our furnaces.

Sulfur Dioxide (SO<sub>2</sub>): Released during the melting process.

Carbon Monoxide (CO): Formed as a byproduct of combustion processes.

Dioxins and Furans (D/F): Trace amounts created during the thermal processing of materials.

Metallic Hazardous Air Pollutants (HAPs): Emitted from the melting of various metal alloys

For this reason, ABM manages its emissions in line with best expected practice for an organization of our size operating in the United States, as is explained in the next section.

b) Measurement and Mitigation

Until beginning the process of ASI membership, ABM was under no obligation to either measure or calculate emissions to air. Under applicable law, that of the state of Alabama, there is no legal obligation to conduct continuous emissions monitoring or direct measurement of non-GHG emissions unless specifically required as a condition of their air permit. ABM has held to this law and has an up-to-date air permit.

The air permit, issued by the Alabama Department of Environmental Management (ADEM) specifies required action to reduce emissions to air by a reasonable degree. These include the prevention of fugitive dust from all activities on site, avoidance of open fire on site, and the operation of air pollution control equipment in the form of the main chamber afterburner system. These actions are followed to the letter by ABM.

ABM has made the decision to go beyond the base expectations of applicable law in order to better understand and improve our environmental impact. As a first step, we have engaged a third party to carry out bi-yearly emissions calculations to provide us with a baseline estimate of current emissions to air. The first issue of this evidence was calculated using an emissions-factor based calculation, in line with IPCC principles. Assuming a 14-hour operation time per day, and year-round operation, our material emissions to air were found to be Sulfur Dioxide and Particulate Matter. Both of these emissions, as calculated, fall well below the levels mandated by ADEM and by the US National Ambient Air Quality Standards.

In addition to these measures, and in line with ASI's aspirational continual improvement recommendations, ABM has arranged for emissions measuring equipment to be installed on their furnace. From December 2025, ABM will therefore go beyond the requirements of applicable law and actively measure emissions to air at point of production. From these measurements a better understanding of ABM's direct impact on air quality in its local area will be gained, and a plan implemented to reduce these as far as practicable. For the reason of comparability and accuracy, baselines for emissions to air will be set from the first direct measurements when they become available, not the third-party calculations.

In addition to this, ABM has set in place a stakeholder engagement and emergency management plan for the event that unacceptably high emissions are detected. ABM also works continuously with its suppliers to source high-quality scrap aluminum, including provision of the cleanest and least contaminated material possible, further lowering the potential emissions to air during the production of ingots. Our commitment to producing quality, in-spec ingots reduces the need for remelting, further minimizing both emissions and energy consumption.

#### Planning Emissions Reduction

ABM is committed to reducing emissions to air through a combination of efficiency improvements, technological upgrades, and proactive monitoring. In addition to complying with

ADEM air permit requirements and installing emissions monitoring equipment on furnaces, ABM will install enhanced combustion technology at the end of 2025 to recycle hot air back into the system, significantly lowering the amount of natural gas required during operations. This upgrade is expected to reduce gas consumption and associated emissions by up to one-third. Furthermore, ABM will continuously improve its preventative maintenance plans to ensure optimal furnace operations and combustion efficiency, thereby minimizing emissions and supporting long-term sustainability goals.

c) Emissions to Water

As with any material processing activity, the conversion of secondary aluminum into quality ingots results in a risk of discharge of contaminants to water. Common emissions to water from aluminum recycling operations include:

Suspended solids: From metal fines and slag particles entering wash water.

Oils and greases: Residues washed off scrap materials or equipment.

Heavy metals: Such as aluminum, zinc, lead, or copper, if present in contaminated scrap.

Chemical additives: Traces of fluxes, cleaning solutions, or wash-down chemicals used in maintenance.

pH-altering substances: Alkaline or acidic effluents from processing or cleaning steps.

Risks of contaminated discharge can come from normal operations that result in wastewater leaving the site without adequate treatment, or from natural runoff events from rainfall and flooding.

ABM takes water stewardship extremely seriously, making effort to prevent and mitigate any discharge to water from our activities. These strategies are outlined in the following section.

d) Mitigation

ABM utilizes water for two primary purposes, firstly as non-contact cooling water and secondly as sanitary water. As these two uses keep water away from contaminant sources, the risk of contamination is limited. As non-contact cooling does not compromise the quality of the water used, it is possible to recycle and reuse the same water for multiple cooling cycles.

This water management system means that we do not discharge process wastewater, with system losses being through evaporation only. Due to our needs, location, and the local public infrastructure, sanitary water is stored onsite in a sealed septic system. This is well maintained and regularly checked for potential leaks, thereby preventing any discharge into the environment and ensuring compliance with all environmental regulations and preventing leakage to the natural environment.

ABM is also concerned with protecting the local watershed from any unintended discharge caused by natural water runoff, particularly runoff from storm rainfall. ABM has committed to

safe, indoor storage of any material that could contaminate rain runoff, maintains clean and clear worksite practices in both indoor and outdoor areas, and regularly tests rainwater for contamination. In addition, ABM has recently invested in multiple storm drain filter socks and implemented an emergency protocol for their use in flood events. This proactive approach underscores our unwavering dedication to sustainable and responsible water management.

e) Spills and Leaks

Aside from accidental discharge of contaminated water, there remains a risk of industrial spills or leaks resulting in air, water, or soil contamination, or in harm to local stakeholders and employees. The two most important risks for ABM are molten metal spills and leakage of contaminants from industrial waste such as dross.

f) Mitigation and Public Disclosure of Spills and Leaks

Our emergency plan for spills and leaks ensures that our site operates effectively to minimize and control spills, protecting our workforce, our local stakeholders, and the environment. In 2024, there were no significant spills at our facility.

We are proud of our spills and leaks track record and put this achievement down to our proactive approach to maintenance, health and safety, and training. We are constantly seeking to improve our control mechanisms and response strategies and will continue to train our staff fully.

ABM is committed to direct and timely communication of spills and leaks to affected communities, with this enshrined in our emergency report plans.

Spill Management Strategy

ABM maintains a proactive spill management plan aligned with ASI guidance to prevent and respond to any incidents that could impact air, water, or soil. The plan includes annual training for employees, routine inspections of containment systems, and leak detection protocols. In the event of a spill, ABM will immediately notify emergency services and affected communities, contain and assess the spill, and implement remediation measures. Root cause analysis is conducted for every incident, followed by updates to risk management and communication plans. All incidents are documented, monitored, and publicly disclosed, with the plan reviewed every five years or after any significant event.

g) Waste Management (non-hazardous) and Disposal

ABM's use of recycled aluminum is a major contributor to a circular and waste free economy. As a waste conscious company, ABM is committed to reduction of waste generation in all of its activities. This is most clearly seen in the internal recycling of any aluminum scrap we generate back into production operations

At present ABM uses a third-party commercial waste collection service to remove and dispose of non-hazardous waste; the service they offer does not include any waste reclamation opportunities, so no waste separation is currently undertaken.

In 2024, the outflow waste generated by ABM came to a total of 62 tons, comprised primarily of packaging of various types. As our business grows and develops, it can be expected that total waste increases year on year; for this reason, a more detailed and effective strategy for waste management is seen as a priority and as a prerequisite for significant business growth.

The constraints placed on ABM in relation to material sorting and disposal are something we are looking to address. We recently wrote and released our 2025 waste management strategy and have made the commitment to explore more environmentally responsible waste management options as soon as practically and financially feasible

#### 2025–2026 Waste Management Strategy

To further reduce landfill contributions and align with circular economy principles, ABM is initiating a partnership with a steam plant in Huntsville, Alabama, to accept our non-metallic waste for incineration as fuel for steam generation. This collaboration is expected to be operational by late 2025 or early 2026 and will significantly reduce the volume of waste sent to landfill. Additionally, ABM has identified that a portion of monthly waste consists of dirt collected from incoming raw material deliveries. We are actively exploring constructive repurposing options for this material to prevent environmental harm and avoid landfill disposal. These initiatives reflect our commitment to continuous improvement and responsible waste management in line with ASI Performance Standard expectations.

#### h) Dross Management

Dross is an unavoidable byproduct of secondary aluminum processing and constitutes the primary industrial waste output of our operations in Crossville. We commit strongly to responsible handling and disposal of this potentially polluting material.

ABM has an ongoing partnership with a third party, who purchase our dross and responsibly process it to recover residual aluminum. In this way we further support the circular economy and ensure that potentially harmful outputs are managed in a positive and sustainable manner.

### 3) Water Stewardship

#### a) Source, Consumption, Discharge

ABM sources all its inflow water from the local municipal supply. In 2024, our efficient water management practices resulted in a total water usage of approximately 6397 gallons at our site of operation. This volume of water is remarkably low and represents a fraction of that needed to produce primary aluminum of the same amount, underlying another of the key advantages to secondary aluminum processing and the strong commitment ABM makes to effective water management.

We do not discharge process wastewater; instead, most of it is lost through evaporation or reused through recirculation. Sanitary water is stored on site in sealed septic receivers and responsibly removed for treatment at regular intervals by qualified professionals, ensuring compliance with all environmental regulations.

b) Reduction and Management Strategy

Water use management is a priority for ABM, and we are always exploring ways to make our operations more water efficient.

ABM’s site of operation in Crossville, Alabama, is located in an area of low water availability risk according to the WWF Risk Filter Suite (Figure 3), meaning that the volumes used by ABM are not seen as negatively impacting local communities and other stakeholders. ABM will continue to monitor water risk in its area of operation and adjust its management strategy and extraction practices accordingly.

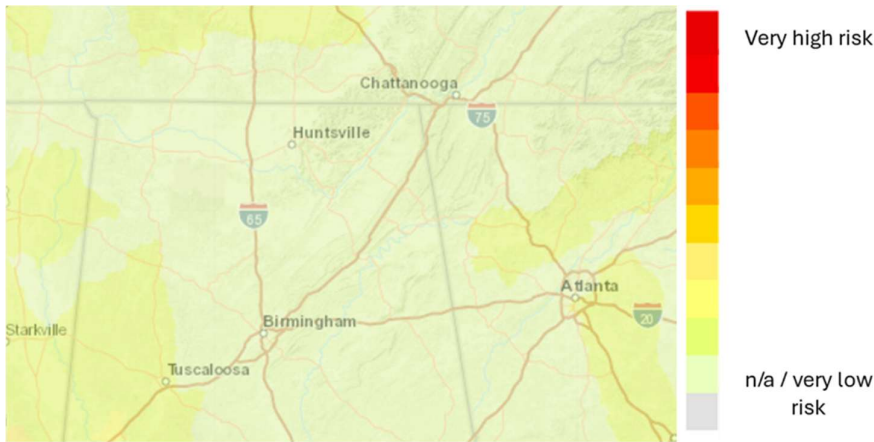


Figure 3 Water availability risk, region of Crossville. Source WWF Risk Filter Suite

4) Biodiversity

a) Biodiversity and Ecosystem Services Risk and Impact Assessment

Biodiversity is described by the SAI as the variability among living organisms from all sources including, among others, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part.

It may appear difficult to immediately understand how maintaining biological diversity, health, and functionality of ecosystems is important to a small manufacturing business such as ABM, but functioning ecosystems maintain essential services that sustain life, and enable business to operate ABM take biodiversity and ecosystem health seriously

In 2025, as part of preparation for the ASI performance standard application, ABM conducted a review of its impact on the biodiversity and ecosystem services of the area local to its operation site. This involved interaction with local stakeholder groups, including local authorities and academics, as well as research into local ecosystem vulnerabilities using the WWF Risk Filter Suite.

ABM’s operational impact is limited to the worksite itself, as well as connected watersheds and airways. Due to the nature of ABM’s operations, and the precautions it takes related to emissions to air and water, it is fair to determine that off-site impacts are extremely limited. There is no land-use change associated with ABM’s activity or the activity of its value chain, no plans to expand operations, and no indication that infrastructure or supplier operations are materially increased through ABM’s operations. It is therefore appropriate to take only ABM’s direct worksite into account when exploring impact on biodiversity and ecosystem service.

According to the WWF Risk Filter Suite, ABM’s Crossville site is not located in a protected area, or one of high or key biodiversity (Figures 4 and 5). The site itself is located in an area of prior industrial use. The lack of key biodiversity and of species of especial concern is supported by the stakeholder input. The condition of local ecosystems is considered extremely low, primarily due to low biodiversity of both terrestrial and marine species, as well as extreme deforestation and a high level of built and agricultural area.

The degraded ecosystem presents a minor risk to ABM, primarily in terms of inadequate and unpredictable water provisioning. Using municipal water means that ABM is dependent on the Cumberland Plateau aquifer and the Tennessee River, both of which are currently safe from overexploitation. ABM’s current usage of water puts almost no additional pressure on the local watershed.

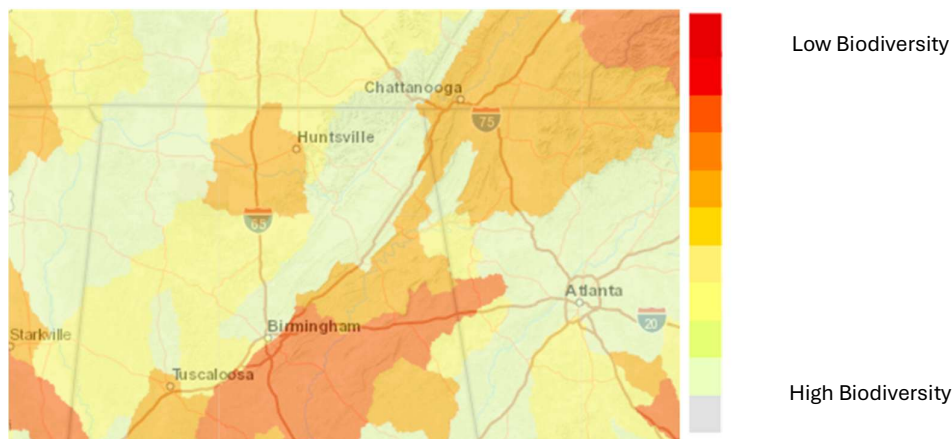


Figure 4 Key Biodiversity areas, region of Crossville. Source WWF Risk Filter Suite

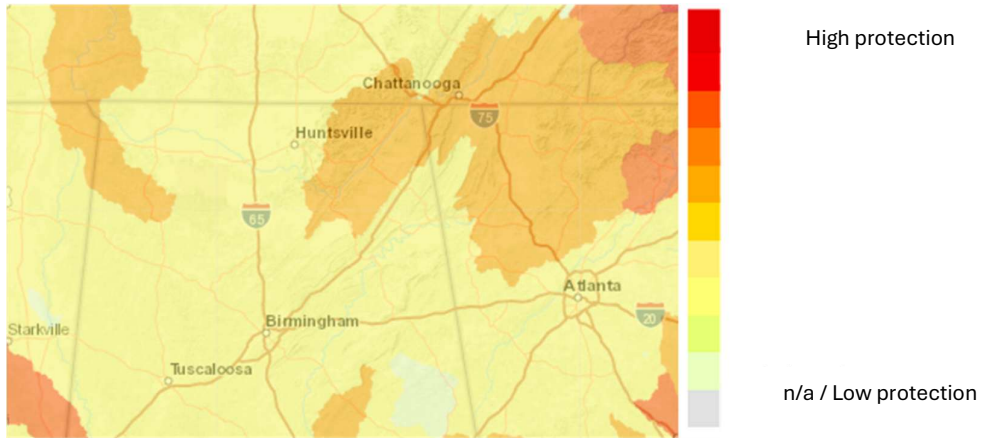


Figure 5 Protected and Conserved areas, region of Crossville. Source WWF Risk Filter Suite

b) Biodiversity management

ABM’s current mitigation strategies of emissions control and reduction, water resource use limitation through recycling of cooling water, and zero discharge policy must be considered adequate to prevent further ecosystem degradation in what must be described as an already degraded ecosystem.

ABM will continue to work with local experts and stakeholders to mitigate our impact and contribute where we can to regeneration.

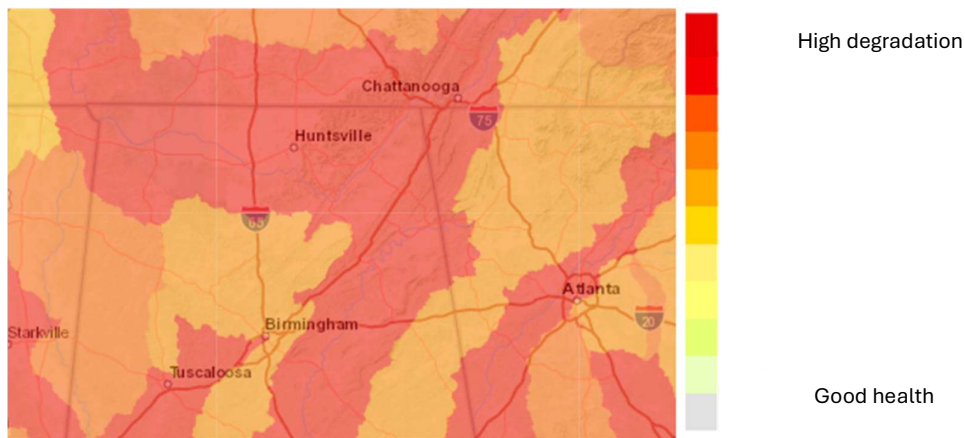


Figure 6 Ecosystem condition, region of Crossville. Source WWF Risk Filter Suite

c) Alien species

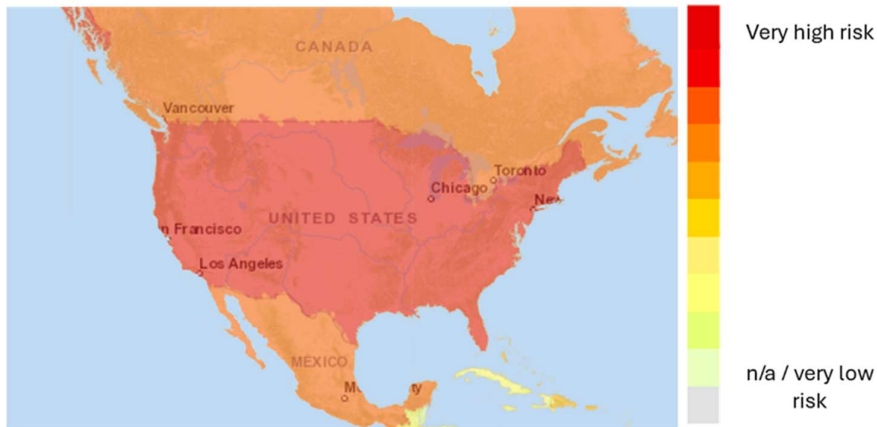


Figure 7 Alien and invasive species risk, region of Crossville. Source WWF Risk Filter Suite

The entirety of the contiguous US is categorized by the WWF Risk Filter Suite as at high risk of invasive species, no differentiation is given for the Crossville area, nor the state of Alabama (Figure 7). ABM cannot be seen as contributing to this risk in any meaningful way. Biological contamination of incoming materials is unlikely, especially as even our furthest away suppliers are located fewer than 600 km from the worksite. All suppliers and customers are US based, and the process method of aluminum scrap to ingots is destructive to invasive organisms.

d) Commitment to no-go in heritage sites

ABM has confirmed through stakeholder engagement and research that its Crossville site does not sit in an area of indigenous or other heritage value. We have no intention of expanding into such areas, we will undertake due diligence in the event of our expansion or move to a new site and formally commit to this decision.

e) Protected areas

It has also been confirmed, by the same means, that the Crossville site is not located in an area protected for any other reason. Again, we commit to full due diligence before any expansion or change of location.

A. SOCIAL

1) Human Rights including Labor rights

a) Statement of Commitments

We at ABM are committed to operating in accordance with all responsible, ethical, and sound business principles and in compliance with all applicable laws and regulations. We pride ourselves in having the right people and the right mindset to succeed in any challenge, this

means also committing ourselves to the highest standards of care and attention in how we look after our employees and those affected by our operations.

It is self-evident to us that upholding human rights in all our areas of operation is non-negotiable. We commit to the principles of human decency, fairness, and dignity through our entire value chain. Just as we are responsible for ensuring the highest quality secondary aluminum reaches our customers each and every time, we are equally responsible for ensuring it gets there without causing undue harm to the rights of stakeholders.

In support of this responsibility, we have recently overhauled our policies and practices to more clearly support human rights, and we will continue to update these to ensure we are always up to date on this important topic.

b) Policies and Practices – own operations (gender, indigenous rights, local community, collective bargaining, child labor, forced labor, non-discrimination, communication, harassment, living wage, working time)

Our growing team of employees is the beating heart of our company, we commit strongly to the protection, development, and fair treatment of our valued team. We also expect a great deal from them; be it hard work and honesty, attention to detail and commitment, or the equitable and fair treatment of other employees, standards are high at ABM.

To promote gender inclusion in a traditionally male-dominated industry, we are implementing a targeted initiative that enhances recruitment, training, workplace design, and leadership development for women. This includes revising job descriptions, offering mentorship, upgrading facilities and PPE, and promoting flexible policies and visibility. We are also committed to supporting women during and after pregnancy through inclusive scheduling, ergonomic accommodations, and a respectful, family-friendly work culture. These efforts aim to create a safer, more supportive environment that attracts and retains women in technical roles—advancing both workforce diversity and social sustainability.

Though we value trust and honesty, and expect the same of our employees, the only way to maintain consistently high standards is to entrench expectations in policy and enact that policy each and every day in practice. The core internal documents in relation to this are the Code of Conduct (CoC) and the Employee Handbook (EH).

Each policy document is reviewed and maintained by management regularly to ensure it adequately fits ABM's commitments, both the CoC and EH been updated in 2025 to reflect ABM's growing ambition and commitment to employee rights. All policy documents are made accessible to our employees in their mother tongue language, and training is proactively provided to ensure everyone is aware of their rights and responsibilities.

The CoC is the central policy document for ABM's engagement with social and labor fairness. It outlines in clear language our commitment to non-discrimination in hiring, employment, opportunity, and action. We believe that all individuals should expect fair treatment, dignity, and respect regardless of their personal characteristics. ABM believes that the value to the person is in their work and attitude rather than age, gender, religion, race, or other characteristic.

Furthermore, we take a strong stance in opposition to harassment of any sort, providing reporting and remedial processes to anyone affected. We provide multiple channels for whistleblowing or the raising of concerns, including anonymous channels. We have a zero-tolerance policy for retaliation of any sort stemming from the raising of concerns. All staff are trained in recognizing and avoiding discriminative behaviors in the workplace and made aware of mediation and reporting mechanisms.

We support international standards on human rights and labor conditions, including but not limited to UN Global Compact and the International Labor Organization's standards. Child and forced labor are both abhorrent to our company and personal values and we have policies in place to ensure neither is ever a part of ABM's operation. We support gender equality in a strongly male-dominated sector, and we are an equal opportunities hirer.

ABM strictly follows both US and Alabama labor laws, giving security to our employees, ensuring fair pay and a work life balance, and allowing freedom of association and collective bargaining. We make sure that wages paid to employees are fair and competitive and comply with local laws and regulations. We regularly review our wage structure to ensure it remains competitive, considering industry and state averages.

Our site is located near the tight-knit and supportive community of Crossville, a community with which we feel deep connection. We strive to include community voices in our policy and decision making, are clear and transparent with our communication with the community in all cases and seek an ever closer and more integrated relationship through our support for juvenile sport in the local community.

c) Policies and Practices – value chain

ABM recognizes that our responsibility does not end at our front door. Aluminum is a material that makes it clearer than most, how an organization's impact ripples up and down the value chain; so too does our commitment to human and labor rights. Our secondary aluminum is sources 100% from the American southeast, this shortens our upstream value chain and significantly reduces the labor and human rights risks normally associated with metal ore extraction and refinement.

Additionally, ABM undertakes a level of supplier due diligence appropriate for the size of our operation and that of our suppliers. We have developed a responsible sourcing policy that is delivered to current and prospective suppliers, undertake off-site quality and standards audits, and encourages both sustainability and social standards improvement in all our suppliers regardless of size.

d) Declaration of incidents and remuneration actions

For trust to be built, transparency is the only option. For this reason, we are happy to disclose that there were no reported incidents of policy breach in terms of discrimination or harassment in 2024, either as a result of our own operations or those of our value chain.

2) Occupational Health and Safety

It is not enough for our employees to feel secure and valued in their employment, they must also feel safe and competent. We at ABM put health and safety at the top of our priority list when producing high quality secondary aluminum products. Molten metal manufacturing process bring with them inherent danger, and this can only be managed by structured, up to date, and well-upheld health and safety procedures.

a) H&S policy and management systems

ABM complied fully with both state and federal law in relation to occupational health and safety management, being fully OSHA compliant and holding regular trainings. Our commitment is to a workplace with zero tolerance for unsafe practice, one hundred percent clarity and competence in emergency measure implementation, and a zero count of occupation health and safety incidents. Our record is exceptionally good, but not yet perfect.

In the year 2024, the health and safety incident report is as follows:

Deaths	0
Cases resulting in days away from work	0
Cases resulting in work restrictions	2
Other recordable cases	4

ABM investigates all incidents in depth, compiles report incident sheets, engages employee experience to identify and implement corrective actions, and apply the hierarchy of control to eliminate any hazards identified.

Of course, it is not wise to rely on reactive response to incidents or near misses in order to improve our standards; we foster a strong and responsible safety culture where everyone is aware and empowered to keep themselves and their co-workers safe. We employ proactive hazard identification, early-stage speak-up policies, and have an active and engaged safety committee to ensure that every day is a school day when it comes to safety improvement

b) Training and engagement

A major pillar of our safety management system is the engagement and education of those at the sharp end of our work. From the first day on the job, we dedicate appropriate time to safety. Training includes both classroom and practical application and is tailored to role to ensure that everyone knows what they need to remain safe. Training does not stop with experience; all

employees undergo continual improvement training to keep knowledge up to date and combat complacency.

### 3) Change Management

For ABM it is not enough to be ethical now, we are committed to ensuring that our operations are responsible, legal, and ethical into the future as well. In order to safeguard this commitment ABM has drawn up change management policies to provide guidance in the event of major business changes such as expansion of the site, expansion to a new site, merger and acquisition, disruption to operations, and even site closure. Major concerns in each concern were environmental and social equity, ensuring that ABM's high standards and deep regard for the value of the environment and for all of our stakeholders are upheld even during disruptive periods.

#### a) Notification of any planned changes or expansions

ABM has no plans to extend, expand, or materially change the nature of our current operations at this time.