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ASI CERTIFICATION  
PERFORMANCE  
STANDARD

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PRESENTED TO

# REMI CLAEYS ALUMINIUM NV

CERTIFICATE  
NUMBER

170

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

26 APRIL 2022

DATE OF EXPIRY

25 APRIL 2025

CERTIFIED SINCE

26 APRIL 2019

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard and  
can be verified at*

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

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CERTIFICATION SCOPE

The process casting of ingots for hot rolling coils. The process of cold rolling and slitting of aluminium coils and strips, and the manufacturing of aluminium HF seam welded tubes at the Lichtervelde facility, Belgium.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Remi Claeys Aluminium NV
ENTITY NAME	Remi Claeys Aluminium NV
CERTIFICATION SCOPE	The process casting of ingots for hot rolling coils. The process of cold rolling and slitting of aluminium coils and strips, and the manufacturing of aluminium HF seam welded tubes, at the Lichtervelde facility, Belgium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	Performance Standard V2
ACQUISITION / DIVESTMENT	The Hydro Aluminium Extruded Solutions owned - Lichtervelde Precision Tubing (Belgium) Entity was purchased by Remi Claeys on 2 July 2021. A Provisional Certification was transferred on 1 December 2021 pending a successful Re-Certification Audit.
AUDIT TYPE	<ul style="list-style-type: none"><li>Re-Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>10 – 11 March 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 May 2022</li></ul>
AUDIT SCOPE	<p><u>Re-Certification Audit (10 – 11 March 2022)</u></p> <p>The audit scope covers the Remi Claeys Aluminium NV facility in Lichtervelde, Belgium.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Semi-Fabrication</li><li>Material Conversion (Production and Transformation)</li></ul>

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All relevant criteria in the ASI Performance Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Full Certification
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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
  - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
  - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION  
PERIOD

26 April 2022 – 25 April 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

25 October 2023

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CERTIFICATE  
NUMBER

170

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Anti-Corruption policy and Integrity program in place and implemented in the organisation by training and compliance activities.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct procedure which includes principles relevant to environmental, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained, at relevant levels in the organisation, Environmental, Social and Governance (ESG) Policies.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedures have senior management approval.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity is communicating the Policies internally to Employees and externally to relevant Stakeholders including Customers and Suppliers. The ESG focus is evident and communicated also at Aurelius Group: <a href="https://aurelius-group.com/en/sustainability">https://aurelius-group.com/en/sustainability</a>
2.2 Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems. Refer to the following links: <a href="https://www.remiclaeys.com/company">https://www.remiclaeys.com/company</a> <a href="https://aurelius-group.com/en/sustainability">https://aurelius-group.com/en/sustainability</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented integrated Social Management Systems. These systems are integrated with the relevant aspects of the ISO 14001 and ISO 45001 certifications and processes related to Aurelius Group's social policies, including the Human Rights Policy, Code of Conduct,

CRITERION	RATING	COMMENT
		management of labour rights and occupational health and safety.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues. The Supplier Code of Conduct is communicated to all Suppliers.
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected Stakeholder groups.
2.7 Mergers and Acquisitions	Conformance	The Entity has a due diligence process for mergers and acquisitions to review environmental, social and governance issues. At Group level, a key component of the sustainability orientation is membership with the UN Global Compact framework and the UN Principles for Responsible Investment (PRI) network: <a href="https://aurelius-group.com/en/sustainability">https://aurelius-group.com/en/sustainability</a>
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has a planning process to review environmental, social and governance issues for closure, decommissioning and divestment activities. At Group level, parent company Aurelius adheres to the principles of UN Global Compact and the UN Principles for Responsible Investment (PRI) network: <a href="https://aurelius-group.com/en/sustainability">https://aurelius-group.com/en/sustainability</a>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The sustainability approach and performance for the Lichtervelde facility for 2021 (up to August 2021) has been made public by the previous owner (Hydro). The Entity will develop their own reporting for 2022.
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. Contact information is available on the website.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used, e.g. through Life Cycle Assessment (LCA) studies performed by independent institutions or case by case with customer interactions and needs.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon a customer request, the Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Upon a customer request, the Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products. Any public communication on LCA will include public access to the LCA information and its underlying assumptions including system boundaries.
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. Where product design occurs, an optimization program is used for the design to maximize outcomes including sustainability, such as through reduction of scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies targeting 100% scrap for collection, recycling and/or reuse, supporting the circular economy.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate Aluminium as a building block for the low-carbon circular economy and continues to reduce its environmental footprint.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaging in different recycling initiatives and increasing capacity to process scrap.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions and energy use in its environmental reporting to the Authorities, available at the following links: Flemish Environmental Agency (water and air): <a href="https://www.vmm.be">https://www.vmm.be</a> Energy Policy Agreement Committee (energy): <a href="https://ebo-vlaanderen.be/nl">https://ebo-vlaanderen.be/nl</a> The Lichtervelde facility was part of the previous owner's (Hydro) approach until August 2021.
5.2 GHG emissions reductions	Conformance	The Entity has a target and strategy to reduce their CO <sub>2</sub> footprint. The Lichtervelde facility was part of the previous owner's (Hydro) approach until August 2021. The Entity has an ongoing process establishing their own targets for 2022.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has systems and procedures to minimize impacts and reports on Emissions to Air to regulators and internally. The performance is presented in the annual reports to Authorities.
6.2 Discharges to Water	Conformance	The Entity has systems and procedures to minimize impacts and report on Discharges to Water to regulators and internally. The performance is followed up by measurements and aggregated results presented in the annual report to Authorities.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects, potential spills and leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has plans, compliance controls and a monitoring program in place to prevent and detect Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has systems and a reporting culture in place to address and disclose potential significant Spills.

CRITERION	RATING	COMMENT
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has systems and a reporting culture in place to address and disclose potential significant Spills.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a strategy on recycling and waste mitigation, developed in accordance with the Waste Mitigation Hierarchy. Several projects and investment on improving recycling are implemented, as well as reducing waste.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses the waste generation and disposals in annual reports to Authorities available at the following links: Flemish Environmental Agency (water/air): <a href="https://www.vmm.be">https://www.vmm.be</a> Flemish Government Information (waste): <a href="https://www.vlaanderen.be">https://www.vlaanderen.be</a> The Lichtervelde facility was part of the previous owner's (Hydro) approach until August 2021.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Conformance	Dross generated from the site is treated with a corporate partner to maximise the recovery of Aluminium. The Entity also implements processes to reduce generation of Dross.
6.8b Dross (recycling)	Conformance	Dross generated from the site is treated with a corporate partner. Dross fines are recycled. The Entity also implements processes to reduce generation of Dross.
6.8c Dross (review of alternatives)	Conformance	All Dross is treated and there is no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use locally and reports through internal environmental reporting mechanisms.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed risks related to operational, internal and external risk in its area of influence. The Entity's water withdrawal, use and water related risks are low.
7.2a Water management (management plans)	Conformance	The Entity has mapped the risks and implements a management plan. From this, time-bound targets and actions are established.
7.2b Water management (monitoring)	Conformance	The Entity monitors the effectiveness of its water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has mapped its water withdrawal and use and reports to local Authorities which are available at the following links: Flemish Environmental Agency (water/air): <a href="https://www.vmm.be">https://www.vmm.be</a> Flemish Government Information (waste): <a href="https://www.vlaanderen.be">https://www.vlaanderen.be</a> The Lichtervelde facility was part of the previous owner's (Hydro) approach until August 2021.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The biodiversity risk is low.

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The biodiversity risk is low.
8.2c Biodiversity management (reporting)	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The biodiversity risk is low.
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics including biodiversity and Alien Species and is proactive in preventing the deliberate or accidental introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy. At Group level, there is respect for and adherence to Human Rights, please refer: <a href="https://aurelius-group.com/site/assets/files/6007/human_rights.pdf">https://aurelius-group.com/site/assets/files/6007/human_rights.pdf</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	A Human Rights Due Diligence process is in place that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights. There is the same focus and commitment at Group level, please refer:

CRITERION	RATING	COMMENT
		<a href="https://aurelius-group.com/site/assets/files/6007/human_rights.pdf">https://aurelius-group.com/site/assets/files/6007/human_rights.pdf</a>
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women. Diversity and inclusion initiatives are established. There is a focus at Group level on diversity and equal opportunities, please refer: <a href="https://aurelius-group.com/site/assets/files/6007/diversity_and_equal_opportunities.pdf">https://aurelius-group.com/site/assets/files/6007/diversity_and_equal_opportunities.pdf</a>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or cultural or sacred sites where the Entity operates.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no requirement for Resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no requirement for Resettlement.
9.7a Local Communities (rights and interests)	Conformance	The Entity's community engagement and policies demonstrate respect to legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. Complaints Resolution Mechanisms are in place.
9.7c Local Communities (livelihoods)	Conformance	The Entity has implemented a proactive approach to working with Local Communities and neighbourhood organizations to improve and support mutual interests.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has included Human Rights in the Supplier Code of Conduct. Suppliers have been assessed through a long-established Human Right Due Diligence process implemented by the previous owner (where the Entity was part of the previous owner until August 2021).

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity respects Human Rights in accordance with recognized standards and good practices and has implemented a Supplier Code of Conduct, Supplier contracts and Supplier training activities. There is respect for and adherence to Human Rights at Group level, please refer: <a href="https://aurelius-group.com/site/assets/files/6007/human_rights.pdf">https://aurelius-group.com/site/assets/files/6007/human_rights.pdf</a>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, in accordance with the ILO Conventions C87 and C98. Please refer: <a href="https://aurelius-group.com/site/assets/files/6007/employer_attractiveness.pdf">https://aurelius-group.com/site/assets/files/6007/employer_attractiveness.pdf</a>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining. There is a freely elected Workers' council and collective bargaining agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	There is no employment of Workers under 16 years. The Entity has established a Human Rights policy where it clearly states that the Entity does not accept Child Labour and will not employ children below the age of 16.
10.2b Child Labour (hazardous)	Conformance	There is no employment of Workers under 16 years. The Entity has established a Human Rights policy where it clearly states that the Entity does not accept Child Labour and will not employ children below the age of 16.
10.2c Child Labour (worst forms)	Conformance	There is no employment of Workers under 16 years. The Entity has established a Human Rights policy where it clearly states that the Entity does not accept Child Labour and will not employ children below the age of 16.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct, as well as their Human Rights policy, prohibits Forced Labour. There were no incidents of Forced Labour identified at the Entity.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	There were no incidents of Forced Labour identified at the Entity and no deposits held or recruitment fees paid.
10.3c Forced Labour (migrant workers)	Conformance	There were no incidents of Forced Labour identified at the Entity and no deposits held or recruitment fees paid.
10.3d Forced Labour (debt bondage)	Conformance	There were no incidents of Forced Labour, including Debt Bondage, found at the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	There were no incidents of Forced Labour identified at the Entity and Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain Workers' original identity papers, only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Conditions for the termination of employment contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	Statements on ensuring equal opportunity are included in the Entity's Code of Conduct and Work regulation. The Work regulation is still a common document for the Entity and the previous owner - there is work in progress with the Workers' representatives/Union representatives to manage the transition in a structured and formal way.
10.5 Communication and engagement	Conformance	The Workers' Council have regular meetings with Management Representatives and are included in Safety Committees.
10.6 Disciplinary practices	Conformance	The Entity's Code of Conduct, Human Rights and Work regulations (Arbeidsreglement) supports fair treatment and disciplinary processes.
10.7a Remuneration (living wage)	Conformance	Wages are defined in Collective Bargaining Agreements and Trade Union wage tables.
10.7b Remuneration (method of payment)	Conformance	Payment of wages is conducted monthly in a punctual manner. All Workers receive pay checks with payment details.
10.8 Working Time	Conformance	Different shift models are in place at the Entity. These are approved by the Workers' council and local authorities. Public holidays and annual leave are paid according to local law.

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a Health and Safety Policy and the Occupational Health and Safety Management System is certified in accordance with ISO 45001.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health, Safety and Environment (HSE) Policy is communicated in several ways, including on noticeboards, via training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Health, Safety and Environment (HSE) Policy includes a commitment to comply with Applicable Law on Workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Health, Safety and Environment (HSE) Policy addresses the importance of safe work always being the most important, and a commitment to comply with all Applicable Laws.
11.2 OH&S Management System	Conformance	The Entity has documented and implemented an Occupational Health and Safety Management System that is conformant with applicable national and is certified in accordance with ISO 45001.
11.3 Employee engagement on health and safety	Conformance	The Entity is following good industry practice on Occupational Health and Safety with close cooperation between management and the employees.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and several key performance indicators are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve.

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

Revision	Date	Notes
0	1 December 2021	Issued following Remi Claeys ASI membership. The site was initially certified as part of Certification 23 for Hydro Aluminium Extruded Solutions.
1	18 May 2022	Issued - Full Certification.