
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HAMMERER ALUMINIUM INDUSTRIES GmbH

CERTIFICATE
NUMBER

76

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

24 FEBRUARY 2020

DATE OF EXPIRY

23 FEBRUARY 2023

CERTIFIED SINCE

24 FEBRUARY 2020

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the Aluminium Stewardship Initiative Ltd.

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

The production of extrusion billets and rolling
ingots from recycled aluminium scrap at Hammerer
Aluminium Industries Holding GmbH (Austria).

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Holding GmbH
CERTIFICATION SCOPE	The production of extrusion billets and rolling ingots from recycled aluminium scrap at Hammerer Aluminium Industries Holding GmbH (Austria).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (3 – 4 December 2019)Surveillance Audit (12 January – 25 February 2022)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">3 – 4 December 2019 (Initial Certification Audit)12 January – 25 February 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 February 2020 (Initial Certification Audit)9 June 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (3 – 4 December 2019)</u></p> <p>The production of extrusion billets and rolling ingots from recycled aluminium scrap.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (12 January – 25 February 2022)</u></p> <p>The production of extrusion billets and rolling ingots from recycled aluminium scrap.</p> <p>Supply chain activities included in the audit scope:</p>

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- Aluminium Re-melting/Refining
 - Casthouses

Criteria in the ASI Performance Standards that were identified as non-conformities from the previous Initial Certification Audit were included in the audit scope.

AUDIT
OUTCOME

- Certification
-

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

24 February 2020 – 23 February 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

23 February 2023

CERTIFICATE
NUMBER

76

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard legal compliance requirements. Systems are implemented (e.g., a legal database) to maintain awareness of and ensure compliance with Applicable Law. The Entity holds valid ISO 14001 and ISO 45001 certificates:</p> <p>https://www.hai-aluminium.com/downloads</p> <p>The HAI Group supports the Entity with legal counsel.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Code of Conduct which is communicated internally and externally. The Entity has provided training to employees with regard to business ethics. The HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor.</p> <p>Further information is available in HAI's Anti-Bribery and Corruption Policy:</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2021/12/code-of-conduct-1_en_v1_20211214.pdf</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance:</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2021/12/code-of-conduct-1_en_v1_20211214.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. Employees are trained periodically on the Policies. The Entity holds valid ISO 14001 and ISO 45001 certificates.</p> <p>Labour and ethics are addressed in the HAI Group's Codes of Conduct for employees and suppliers. The Entity's Policy statement, ISO certificates and Code of Conduct statements are available:</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2021/11/ISO-14001-DE_EN.pdf</p>

CRITERION	RATING	COMMENT
		<p>(ISO 14001 certificate) https://www.hai-aluminium.com/wp-content/uploads/2021/11/ISO-45001-DE_EN.pdf</p> <p>(OHSAS 18001 certificate) https://www.hai-aluminium.com/wp-content/uploads/2022/02/infotafel_umwelt-gesundheit-sicherheit-en-700x1000_v1_20220221.pdf</p> <p>(EHS Policy statement) https://www.hai-aluminium.com/wp-content/uploads/2021/03/infotafel_coc_v3_a4_en_20210211.pdf</p> <p>(Code of conduct for employees) https://www.hai-aluminium.com/wp-content/uploads/2021/12/code-of-conduct-1_en_v1_20211214.pdf</p> <p>(Code of conduct for Suppliers)</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement and provides support for the provision of resources and regular review of the Policies. The Entity holds valid ISO 14001 and ISO 45001 certificates.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the relevant Policies internally and externally as appropriate (i.e., company website, intranet). The Supplier Code of Conduct is actively communicated to suppliers. The Quality Policy Environment, Health, and Safety (EHS) Policy and Codes of Conduct for employees and suppliers are available:</p> <p>https://www.hai-aluminium.com/downloads</p>
2.2 Leadership	Conformance	The Entity's Chief Operating Officer (COO) (Technical Managing Director) has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard and providing sufficient resources to support its implementation. Responsibilities are reflected in the organisational chart.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015:</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2021/11/ISO-14001-DE_EN.pdf</p>
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity has implemented a certified Health and Safety Management System (ISO 45001), and there were no violations of the social requirements. However, it was identified the Social Management

CRITERION	RATING	COMMENT
		System is not fully effective as it is not documented adequately.
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a sourcing Policy, 'Code of Conduct for Suppliers': https://www.hai-aluminium.com/wp-content/uploads/2021/12/code-of-conduct-1_en_v1_20211214.pdf</p> <p>The Entity's sourcing process is documented, and regular Due Diligence and supplier evaluations are undertaken.</p>
2.5 Impact Assessments	Conformance	<p>The Entity is located in a highly regulated country (Austria), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process. The Entity has systems to manage this effectively. Large projects or Major Changes to existing Facilities did not take place since the Entity joined the Aluminium Stewardship Initiative (ASI) as a Member.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has implemented a site-specific emergency response plan. The plan was developed in collaboration with relevant Stakeholders such as the neighbouring industrial facility and relevant authorities. The Entity holds valid ISO 14001 and ISO 45001 certificates.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has not undergone or planned a merger or acquisition (M&A) since it joined ASI. However, the Entity has a documented process to manage M&As, should it become relevant.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a procedure for closure, decommissioning and divestment. There have been no such events since 2010.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has disclosed its governance approach and its material environmental, social, and economic impacts via its Sustainability Report: https://www.hai-aluminium.com/downloads</p>
3.2 Non-compliance and liabilities	Conformance	<p>Information on significant fines, judgments, penalties, and non-monetary sanctions is included in the Sustainability Report 2020, page 25: https://www.hai-aluminium.com/downloads</p> <p>There have been no significant fines, judgments, penalties, and non-monetary sanctions enforced since the Entity joined ASI.</p>

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to Anti-Corruption requirements related to payments to governments and the facilitation of payments. The Codes of Conduct for Employees and Suppliers are available at: https://www.hai-aluminium.com/downloads According to the 2020 financial audit report, the Entity did not make government payments other than taxes, fees, and social insurance. All payments are subject to an annual external financial audit.
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 established accessible Complaints Resolution Mechanisms to address Stakeholder complaints, grievances and requests for information related to its operations. A dedicated e-mail address (ethics@hai-aluminium.com) is accessible for all Stakeholders. Employees can also direct their concerns to Worker representatives. Due to the size and nature of the business, Stakeholders can also easily reach top management directly.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major Products in a Life Cycle Assessment (LCA), which meets ISO14040/14044 requirements. The study was created by a specialised external institute. The study has not been made publicly available, but the Entity provides LCA information upon request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides adequate cradle-to-gate life cycle information upon customer request.
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	The Entity provides information regarding the carbon footprint of its Products and conducted a Life Cycle Assessment (LCA) in 2020: https://www.hai-aluminium.com/wp-content/uploads/2022/01/Information-on-Sustainability-EN-1.pdf However, it was identified the Entity does not provide access to the LCA and its underlying assumptions including system boundaries.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented systems and a program to recycle 100% of its Aluminium Process Scrap within its operations, the HAI Group or with external partners. The Entity has achieved close to a 100% recycling rate of scrap. The waste balance is reported in the Sustainability Report 2020, page 23: https://www.hai-aluminium.com/downloads
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a recycler of Aluminium, the Entity has a defined strategy to maximise the use of scrap and monitors the status of implementation of the strategy monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with Collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has disclosed its Greenhouse Gas (GHG) Emissions and energy use by source in its Sustainability Report 2020: https://www.hai-aluminium.com/downloads Emissions originating from the combustion of diesel fuel are not included in published data, as this source is not material to the Entity according to the Greenhouse Gas protocol definition of materiality (which has a limit of 5%). The Entity's consumption of diesel is approximately 2.5 % of total energy consumption.
5.2 GHG emissions reductions	Conformance	The Entity has published GHG Emissions reduction targets and implemented a plan to achieve these targets. Further information is available in Sustainability Report 2021, pages 30-31: https://www.hai-aluminium.com/wp-content/uploads/2022/08/sustainability-report-2021-de_v5_20220608.pdf Note: As a Remelter, the Entity has limited opportunities to minimise indirect GHG Emissions.
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.

CRITERION	RATING	COMMENT
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	Air emission data is collected and reported in the annual Sustainability Report 2020, page 25: https://www.hai-aluminium.com/downloads
6.2 Discharges to Water	Conformance	The Entity does not directly discharge effluents to water (e.g., creeks or rivers). Instead, effluents are treated in the neighbouring facility's industrial wastewater treatment plant. The Entity has disclosed its Discharges to Water in its Sustainability Report 2020: https://www.hai-aluminium.com/downloads
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Within the scope of its certified Environmental Management System according to ISO 14001, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water, or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established and implemented management and external communication plans, compliance controls and a monitoring programme to prevent and detect Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented procedures to ensure the disclosure to affected parties of the volume, type, and potential impact of significant Spills immediately following an incident. There was no significant release of substances in the 2020 reporting year.
6.4b Reporting of Spills (regular reporting)	Conformance	There was no significant release of substances in the 2020 reporting year, as reported in the Sustainability Report 2020, page 25: https://www.hai-aluminium.com/downloads
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy in line with its ISO 14001 certification. Several types of waste (such as Hazardous Waste, recyclable waste, Aluminium, and Dross) are segregated and disposed of or treated in accordance with local law. The Entity's current waste management concept does not contain defined waste-related targets.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the quantity of waste generated in the Sustainability Report 2020, page 23:

CRITERION	RATING	COMMENT
		https://www.hai-aluminium.com/downloads
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.
6.8a Dross (recovery)	Conformance	The Entity has maximised the recovery of Aluminium through the treatment of Dross and Dross residues. One hundred percent of the Dross is treated and sent to a neighbouring industrial facility or the Entity's subsidiary in Romania for recovery of the Aluminium content (salt process).
6.8b Dross (recycling)	Conformance	One hundred percent of the Dross is treated, and locally recovered Aluminium is fed back into the casting process.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable as the Entity does not dispose of Dross residues in landfill. A specialised refining company recycles the Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has implemented a system to identify and map its water withdrawal by use, source and by type. Water is supplied by and discharged to a neighbouring industrial facility.
7.1b Water assessment (risk assessment)	Conformance	The Entity's water requirements are fully supplied by a neighbouring industrial facility that is certified to the ASI Performance Standard. Water-related risks in the Watersheds are assessed by the neighbour and not by the Entity.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as the Entity does not develop its water management plan, as the water is supplied by its large industrial neighbour.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as the Entity does not develop its water management plan, as the water is supplied by its large industrial neighbour.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water consumption in the Sustainability Report 2020, page 24: https://www.hai-aluminium.com/downloads
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has systematically assessed the risks 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's biodiversity assessment did not identify any material risks and therefore no action plan was necessary.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's biodiversity assessment did not identify any material risks and therefore no action plan was necessary.
8.2c Biodiversity management (reporting)	Conformance	The Entity's biodiversity assessment did not identify any material risks and therefore no action plan was necessary.
8.3 Alien Species	Conformance	During the Entity's thermal processing of the Aluminium Scrap, all species are destroyed. Relevant remaining risks are from the wooden pallets, which are all treated according to the International Standards for Phytosanitary Measures No. 15 (ISPM 15).

CRITERION	RATING	COMMENT
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 issued and implemented its Code of Conduct for Employees and Code of Conduct for Suppliers which express a commitment to respect Human Rights: https://www.hai-aluminium.com/downloads
9.1b Human Rights Due Diligence (process)	Conformance	The HAI Group has conducted a documented Human Rights Due Diligence assessment, however, consultation with external stakeholders was not systematic. The Entity is embedded in the Community and society and as witnessed by interviewed stakeholders and management, there are currently no salient issues regarding Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The HAI Group’s Human Rights assessment has confirmed no salient adverse Human Rights impacts are present at the Entity. Indigenous Peoples are not present in the region.
9.2 Women’s Rights	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the women’s rights requirements. Interviews and document reviews confirm there is no indication of deliberate Discrimination against women. The HAI Group reports publicly on gender diversity indicators such as the number of female/male Workers. Further information is available in the Sustainability Report 2020, page 27: https://www.hai-aluminium.com/downloads
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources directly affected by the Entity’s operations.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples or their lands, territories and resources directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as no resettlements are being considered or taking place or are expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no resettlements are being considered or taking place or are expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Not Applicable	This Criterion is not applicable as the outcome of the Human Rights Due Diligence assessment has confirmed that there are no issues with Local Communities and no need for action.
9.7b Local Communities (impacts)	Not Applicable	This Criterion is not applicable as the outcome of the Human Rights Due Diligence assessment has confirmed that there are no issues with Local Communities and no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable as the outcome of the Human Rights Due Diligence assessment has confirmed that there are no issues with Local Communities and no need for action.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located in or near Conflict-Affected or High-Risk Areas (CAHRAs). The Entity follows the definition of CAHRAs from the 'Armed Conflict Location Event Data Project' and 'Peace Direct'. All new suppliers undergo a Due Diligence process and according to the list of suppliers, there is no supply from CAHRAs.
9.9 Security practice	Conformance	The Entity does not employ armed security forces. The Entity's Human Rights risk assessment identified no specific risks related to security practices. Worker interviews confirmed no known human rights violations caused by the security service. Security is operated by the

CRITERION	RATING	COMMENT
		neighbouring company, which is certified to the ASI Performance Standard.
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 unite freely in unions, seek representation and join the Works Council without interference. Freely elected Worker representatives are in place.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, participates in any Collective Bargaining process in good faith to the extent possible under Applicable Law and adheres to Collective Bargaining Agreements where and as far as such agreements exist. The Entity is a member of the employers' industry association and they have negotiated Collective Bargaining Agreements with the union. Additionally, site-specific agreements have been negotiated with the Workers' representative body (Works Council).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	The Entity neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker was an apprentice who was 15 years old. The Entity has robust practices to ensure that children are not employed.
10.2b Child Labour (hazardous)	Conformance	The Entity neither use nor support the use of Child Labour. The minimum working age of 15 years is respected.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. There are robust practices to ensure that children are not employed.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour or Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, Recruitment Fees or equipment advance from

CRITERION	RATING	COMMENT
		Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. The Entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. Applicants must present identification documents, but only copies are filed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and communicates this commitment in its Code of Conduct. The Entity does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to Discrimination. This was confirmed by interviews and document review. Employees receive diversity and Anti-Discrimination training.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment.
10.6 Disciplinary practices	Conformance	The Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working

CRITERION	RATING	COMMENT
		time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid are above the legal minimum and are in line with the national industry standard.
10.7b Remuneration (method of payment)	Conformance	The Entity's payments of wages are timely, in legal tender and documented. Payments are transferred to employees' bank accounts.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and each employment contract.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented and communicated its Occupational Health and Safety (OH&S) Policy. The Entity holds a valid ISO 45001 certificate: https://www.hai-aluminium.com/downloads
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented and communicated (e.g., postings, intranet, internet) its OH&S Policy and is subject to employee training.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has included in its Policy statement relating to OH&S and in the Codes of Conduct, a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has included in its Codes of Conduct for both employees and suppliers, the right of Workers to understand the hazards and safe practices for their work and the authority to refuse or stop unsafe work. This is reiterated in the Entity's safety manual.
11.2 OH&S Management System	Conformance	The Entity has implemented and communicated its OH&S Policy as required by the ASI Performance Standard. The Entity holds a valid ISO 45001 certificate: https://www.hai-aluminium.com/downloads
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented a joint Health and Safety Committee where Workers can raise, discuss, and participate in the resolution of OH&S issues with management. Note: Due to the COVID-19 pandemic, the Entity's Health and Safety Committee met twice in 2021

CRITERION	RATING	COMMENT
		(which complies with local law). As soon as the situation allows, the schedule of four meetings per annum will return.
11.4 OH&S performance	Conformance	The Entity evaluates OH&S performance regularly with key performance indicators related to OH&S. The Entity has implemented tools to evaluate performance and continuously improve its OH&S Management System.

Document Control and Version History

Revision	Date	Notes
0	24 February 2020	Initial Certification Audit – Full Certification
1	25 March 2021	Revised to correct incorrect public headline statements relating to Criteria 9.3, 9.4, 9.5, 9.6a and b.
2	17 August 2021	Surveillance Audit