ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

SPEIRA

CERTIFICATE NUMBER

20

ASI STANDARD

PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL

FULL CERTIFICATION ASI ACCREDITED AUDITOR

DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE

13 MARCH 2022

DATE OF EXPIRY

12 MARCH 2025

CERTIFIED SINCE

13 MARCH 2019

AUTHORISED BY

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

CERTIFICATION SCOPE

Speira consisting of facilities in Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Holmestrand (Norway) and Karmøy (Norway), and the Speira corporate office (Grevenbroich).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Speira
ENTITY NAME	Speira
CERTIFICATION SCOPE	Speira consisting of facilities in Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Holmestrand (Norway) and Karmøy (Norway), and the Speira corporate office (Grevenbroich).
SUPPLY CHAIN ACTIVITIES	 Aluminium Smelting Aluminium Re-melting / Refining Casthouses Semi-Fabrication
ASI STANDARD	Performance Standard V2
AUDIT EIRM	 Initial Certification Audit (10 October 2018 – 20 February 2019) Scope Change Audit (11 December 2019 – 12 December 2019) Re-Certification and Scope Change Audit (24 May 2022 – 1 September 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	 10 October 2018 – 20 February 2019 (Initial Certification Audit) 11 December 2019 – 12 December 2019 (Scope Change Audit) 24 May 2022 – 1 September 2022 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	 3 July 2019 (Initial Certification Audit) 4 March 2020 (Scope Change Audit) 12 October 2022 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	Initial Certification Audit (10 October 2018 – 20 February 2019) The audit scope covered Grevenbroich, Hamburg and Rheinwerk/Neuss (Germany), Karmøy (Norway), and the corporate office (Norway). Supply chain activities included in the audit scope: Aluminium Smelting

Aluminium Re-melting / Refining

- Casthouses
- Semi-Fabrication

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

First Scope Change Audit (11 December 2019 – 12 December 2019)

The audit scope covered the site in Holmestrand, Norway.

Supply chain activities included in the audit scope:

- · Aluminium Re-melting / Refining
- Casthouses
- Semi-Fabrication

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

Re-Certification and Second Scope Change Audit (24 May 2022 – 1 September 2022)

The audit scope covered site operations at Grevenbroich, Hamburg, and Rheinwerk (Germany), Karmøy and Holmestrand (Norway), along with Speira's corporate operations (Germany).

The ASI Multi-Site sampling approach was undertaken to include the production sites located in Grevenbroich, Rheinwerk/Neuss, and Karmøy as well as Speira Headquarters.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting / Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard 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.

NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	12 March 2025
CERTIFICATION NUMBER	20

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. The Entity's Human Rights Policy and Supplier Code of Conduct can be assessed at: https://www.speira.com/certifications-policies	
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. An Anti-Corruption Policy and Integrity program have been developed and implemented in the organisation through training and compliance activities.	
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct procedure including principles relevant to Environmental, Social and Governance (ESG) performance.	
PRINCIPLE 2 POLICY & MANA	GEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained the Organisation, Environmental, Social and Governance Policies.	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policies and procedures are reviewed and updated regularly, and all corporate Policies and procedures have senior management approval. The Policy documents have been reviewed and updated according to Speira.	
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies and procedures are reviewed and updated on a regular basis, and all corporate Policies and procedures have senior management approval.	
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative 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.	
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an integrated Social Management Systems.	

CRITERION	RATING	COMMENT		
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues.		
2.5 Impact Assessments	Conformance	The Entity has established procedures for conducting environmental, social, cultural and Human Rights Impact Assessments (HRIAs), including gender analysis, for New Projects or Major Changes to existing Facilities.		
2.6 Emergency Response Plan	Conformance	The Entity has developed site-specific emergency response plans in collaboration with potentially affected Stakeholder groups such as Local Communities, employees and their representatives, and relevant emergency services.		
2.7 Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues as part of its Due Diligence process for mergers and acquisitions. And are included in the Entity's Social Responsibility Guidelines.		
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has reviewed Environmental, Social and Governance issues in the Due Diligence process for Mergers and Acquisitions. And are included in the Entity's Social Responsibility Guidelines.		
PRINCIPLE 3 TRANSPARENCY	PRINCIPLE 3 TRANSPARENCY			
3.1 Sustainability Reporting	Minor Non- Conformance	The Entity has disclosed its governance approach and material environmental, social, and economic impacts within its annual reports up to 2020. In 2021 when Speira was formed, it was identified there was no annual report for Speira, but each site reported its impacts to the German and Norwegian national government bodies.		
3.2 Non-compliance and liabilities	Minor Non- Conformance	The Entity's information on non-compliance and liabilities has not been published for 2021. No fines, judgments, penalties, or non-monetary sanctions have been issued.		
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes or has made payments to governments on a legal and/or contractual basis.		
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	Minor Non- Conformance	The Entity has established the Complaints Resolution Mechanism 'Speira Speaks Up' to address Stakeholder complaints, grievances and requests for information relating to its operations.		

CRITERION	RATING	COMMENT
		However, it was identified a link to the Complaints Resolution Mechanism is not available on the website.
PRINCIPLE 4 MATERIAL STEW	ARDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for which Aluminium is considered or used. For instance, through Life Cycle Assessment (LCA) studies performed by independent institutions or according to customers' interactions and needs.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has publicly communicated LCA information through international studies and develops Environmental Product Declarations (EPDs) upon customer request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly communicated LCA information through the international studies available on European Aluminium's website: www.european-aluminium.eu/resource-hub/environmental-profile-report-2018 The EPD for the Karmøy site is available to the public at www.epd-norge.no
4.2 Product design	Conformance	The Entity has integrated clear objectives in the design and development process for products and components to enhance their sustainability, including the environmental life cycle impacts of the product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies, procedures, and practices to minimise Aluminium Process Scrap generation at all sites. The targets to reduce waste and scrap generation support Circular Economy (CE) considerations.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented systems and processes to separate Aluminium alloys and grades for recycling. Goals for recycling have been established and these are followed up at all sites. All scrap generated is separated and sent to remelters for remelting with appropriate alloy grades.
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 CE, continue to reduce its environmental footprint and increase the recycling of Post-Consumer Scrap. And has established targets, activities, and timelines.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has engaged in various recycling initiatives and increased its capacity to remelt and process Pre/Post-Consumer Scrap.
PRINCIPLE 5 GREENHOUSE G	AS EMISSIONS	
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses its Scope 1 Greenhouse Gas (GHG) Emissions and energy use in its annual report to European authorities as part of the EU Emissions Trading Scheme (ETS). The ETS reports are third party verified.
5.2 GHG emissions reductions	Minor Non- Conformance	The Entity has established a target and strategy for net zero emissions by 2050. Different roadmaps, projects and energy-saving initiatives support this strategy. However, it was identified the short-term GHG Emissions reduction targets have not been publicly disclosed.
5.3a Aluminium Smelting (management system)	Conformance	The Entity has established a Management System to control and limit GHG Emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has demonstrated its smelting activity's Direct GHG Emissions are below the eight tonnes CO ₂ Equivalent (CO ₂ -e) per metric tonnes Aluminium target.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity is not planning to commission any new Aluminium smelters after 2020.
PRINCIPLE 6 EMISSIONS, EFF	LUENTS AND V	VASTE
6.1 Emissions to Air	Conformance	The Entity has established systems and procedures to monitor and report emissions to air to regulators. This information is available to the public on government bodies' web pages (i.e., https://www.norskeutslipp.no for Norway)
6.2 Discharges to Water	Conformance	The Entity has established systems and procedures to report on discharges of water to local and national regulators.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity 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 established 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 systems and established a reporting culture to address and

CRITERION	RATING	COMMENT
		disclose potential significant Spills. No incidents have been reported in 2022.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented systems and established a reporting culture to address and disclose potential significant Spills. No incidents have been reported in 2022.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a recycling and waste mitigation strategy in line with the Waste Mitigation Hierarchy. The Entity has implemented several projects and investments in recycling at its production sites.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has reported waste generation and disposal for each site to the national authorities.
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)	Conformance	The Entity has established processes and procedures to manage Spent Pot Lining (SPL) in a safe way to prevent leachate to the environment.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity separates and manages carbon and refractory materials from SPL to recover and reuse the materials in other applications.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill any SPL from its Facility at Rheinwerk/Neuss.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity does not landfill any SPL generated at its Facility at Rheinwerk/Neuss.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not landfill any SPL from its Facility and the storage area prevents leachate to water.

CRITERION	RATING	COMMENT	
6.8a Dross (recovery)	Conformance	The Entity recovers Aluminium metal from Dross at its production sites and with a corporate partner to maximise the recovery of Aluminium by treatment of Dross, both at the Entity's sites and from Dross residues managed by the corporate partner.	
6.8b Dross (recycling)	Conformance	The Entity has implemented procedures and processes to maximise the recycling of Dross and Dross residues. Recovered Aluminium from Dross is recycled in the Casthouses. No Dross from the Entity's production is landfilled.	
6.8c Dross (review of alternatives)	Conformance	The Entity uses recovered Aluminium from the Dross in its process and no Dross is sent to landfill. The recovered Aluminium is recycled at the Entity's sites.	
PRINCIPLE 7 WATER STEWAR	DSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type, for all production sites.	
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks for all production sites. No material risks have been identified.	
7.2a Water management (management plans)	Conformance	The Entity has mapped and monitored its water use at all sites. There are no material risks identified concerning water use at any of the Entity's sites.	
7.2b Water management (monitoring)	Conformance	The Entity supports the United Nations Sustainable Development Goals (SDGs) and has identified Water Stewardship as a priority topic for its operation. Water use at the production sites is monitored. No material risks have been identified at the Entity's site regarding water withdrawal and use.	
7.3 Disclosure of water usage and risks	Conformance	The Entity has reported water withdrawal and its use to local authorities according to permit requirements.	
PRINCIPLE 8 BIODIVERSITY			
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. All sites are located in industry park settings.	
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has addressed issues on the loss of biodiversity and degradation, especially in areas with high influence. There are currently no material	

CRITERION	RATING	COMMENT
		risks identified concerning biodiversity at the Entity's sites.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has assessed the risks and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The sites are all located in industry park settings and have implemented the Biodiversity Mitigation Hierarchy in the methodology.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported on biodiversity issues to Stakeholders in annual reporting to national and local authorities.
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics such as biodiversity and Alien Species with a focus on imported wood products (e.g., pallets, packaging) and ballast water from ships.
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 RIG	HTS	
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy, available at: https://www.speira.com/certifications-policies
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted an extensive Human Rights risk mapping in cooperation with the Danish Institute for Human Rights on the entirety of its supply chain, including, its business partners and sub-Contractors, detailed by country and site, with a focus on the upstream and downstream value chain. The report is available at: https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro

CRITERION	RATING	COMMENT	
9.1c Human Rights Due Diligence (remediation)	Not Applicable	This Criterion is not applicable due to the result of the Human Rights Impact Assessments in cooperation with the Danish Institute on Human Rights.	
9.2 Women's Rights	Conformance	The Entity has implemented a Code of Conduct against harassment and Discrimination in all forms, respects equality between genders and works to increase the share of women in the workforce.	
9.3 Indigenous Peoples	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.	
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.	
9.5 Cultural and sacred heritage	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.	
9.6a Resettlements (avoid or minimise)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.	
9.6b Resettlements (where unavoidable)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.	
9.7a Local Communities (rights and interests)	Conformance	The Entity Human Rights Impact Assessments performed by The Danish Institute addresses this criterion.	
9.7b Local Communities (impacts)	Conformance	The Entity Human Rights Impact Assessments performed by The Danish Institute addresses this criterion.	
9.7c Local Communities (livelihoods)	Conformance	The Entity has developed an approach in cooperation with Local Communities and neighbourhood organisations to improve and support mutual interests.	
9.8 Conflict-Affected and High- Risk Areas	Not Applicable	This requirement is not applicable in the areas where the Entity operates.	
9.9 Security practice	Conformance	The Entity has demonstrated it adheres to the Voluntary Principles on Security and Human Rights. Speira's Policies apply to all security personnel.	
PRINCIPLE 10 LABOUR RIGHTS			
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity recognises the principle of Freedom of Association and the right to join Labour Unions or employee organisations in line with the ILO Conventions.	

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Freely elected Works Councils and Collective Bargaining Agreements have been implemented at all sites.
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	The Entity has established a Human Rights Policy stating that it does not accept Child Labour. Speira does not employ anyone under the age of 16.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a Human Rights Policy stating that it does not accept Child Labour. Speira does not employ anyone under the age of 16. Apprentices under 18 years old work under supervision and are not allowed to do any hazardous work or night shifts.
10.2c Child Labour (worst forms)	Conformance	The Entity has established a Human Rights Policy stating that it does not accept Child Labour. Speira does not employ anyone under the age of 16.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a Code of Conduct and Supplier Code of Conduct which restricts the use of Forced labour. The Entity is opposed to all forms of Human Trafficking and Child Labour abuse and does not employ or contract compulsory or Forced Labour. The Supplier Code of Conduct is available at: https://www.speira.com/certifications-policies
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers. The Entity has demonstrated that it does not accept deposits or recruitment fees.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers. The Entity has demonstrated that it does not accept deposits or recruitment fees.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has demonstrated there are no incidents of Forced Labour at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has demonstrated there are no incidents of Forced Labour at the Entity's sites. Workers are free to leave their workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has demonstrated there are no incidents of Forced Labour at the Entity's sites. The Entity does not keep original identity documentation.

CRITERION	RATING	COMMENT	
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has demonstrated there are no incidents of Forced Labour at the Entity's sites. The conditions for termination are defined by law, and the Collective Bargaining Agreements and are included in Workers' contracts.	
10.4 Non-Discrimination	Conformance	The Entity has established procedures and practices to ensure non-Discrimination and equal opportunities for Workers, in line with the ILO Conventions.	
10.5 Communication and engagement	Conformance	The Entity has demonstrated open communication, direct involvement and engagement of Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues. The Workers' Council has regular meetings with Management Representatives and is part of the Health and Safety Committee.	
10.6 Disciplinary practices	Conformance	The Entity has established Policies and procedures to ensure the rights of all Workers, it does not tolerate any use of punishment, harassment, or violence. This was verified through interviews with works council members, security personnel and Human Resources.	
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented procedures for Remuneration practices. The Entity pays living wages and is defined by the Collective Bargaining Agreements and trade union wage tables.	
10.7b Remuneration (method of payment)	Conformance	The Entity has established and implemented procedures for Remuneration practices. Payments of wages occur monthly in a punctual manner. All Workers receive payslips with payment details.	
10.8 Working Time	Conformance	The Entity has established and implemented procedures for Working Time practices. Different shift models are in place for the Entity's sites. These are approved by the Work Councils and the national authorities for different shift models. Public holidays and annual leave are paid according to national legal requirements and national standards.	
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY			
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established an Occupational, Health and Safety (OH&S) Policy that supports Health, Safety, and Environment (HSE) risk reduction and awareness.	

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's OH&S Policy is communicated to employees, Contractors, and Visitors. It is posted on boards at site premises and communicated through training and contracts with external Stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy addresses the importance of safe work, reducing risk and a commitment to comply with applicable legal requirements.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's OH&S Policy addresses the right of Workers to refuse or stop unsafe work by the fact that 'safe work is always most important' and includes a commitment to comply with applicable legal requirements.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented OH&S Management System that conforms with national and international standards. All sites hold valid ISO 45001 certifications.
11.3 Employee engagement on health and safety	Conformance	The Entity has a documented and implemented OH&S Management System that complies with applicable national and international standards. Formal cooperation between management and Workers is in place at all sites.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance regularly and has several KPIs for OH&S performance. The Entity has established tools to evaluate performance and ensure that it continuously improves.

Document Control and Version History

Revision	Date	Notes
0	13 March 2019	Issued - Certification
1	10 March 2020	Updated to reflect Certification Scope change with addition of the Holmestrand site, Norway, and provision of revised hyperlinks.
2	20 December 2021	Transfer of Certification to Speira from Hydro Aluminium Rolled Products – Provisional Certification.
3	28 October 2022	Re-Certification Audit - Full Certification