
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

GRANGES AMERICAS, INC.

CERTIFICATE
NUMBER

234

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

6 DECEMBER 2022

DATE OF EXPIRY

5 DECEMBER 2025

CERTIFIED SINCE

6 DECEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

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

Design and manufacture of rolled strip and sheet of aluminum at Granges Americas, Inc production sites in Huntingdon (TN), Newport (AR) and Salisbury (NC) and the related corporate functions at the Headquarters in Franklin (TN) in the USA.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Granges Americas, Inc.
CERTIFICATION SCOPE	Design and manufacture of rolled strip and sheet of aluminum at Gränges Americas, Inc production sites in Huntingdon (TN), Newport (AR) and Salisbury (NC) and the related corporate functions at the Headquarters in Franklin (TN) in the USA.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	22 – 26 August 2022
AUDIT REPORT SUBMISSION	27 October 2022
AUDIT SCOPE	<p>The audit scope covers the production sites in Huntingdon (TN) (Aluminium re-melting, casting, and rolling operations), Salisbury (NC) (Aluminium re-melting, casting and rolling operations) and the related corporate functions at the Headquarters in Franklin (TN).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>The Entity uses the ASI multi-site sampling approach, and the Newport (AR) site was not included in the audit scope. The audit of the Headquarters was undertaken remotely, consistent with a multi-site approach.</p>

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

6 December 2022 – 5 December 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

5 June 2024

CERTIFICATE
NUMBER

234

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a system for surveying and managing Legal Requirements, Compliance Obligations Listing and Compliance Obligations Evaluation.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery through the implementation of the Code of Conduct and global Anti-Corruption Policy:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gd12_granges_-anti-corruption-policy.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2022.pdf</p> <p>Employees have received training on the online platform 'Gränges Academy' and are trained during the integration process and annually. The Entity's performance in delivering Code of Conduct training is disclosed at:</p> <p>https://www.granges.com/sustainability/framework-and-targets/targets-and-target-fulfilment</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes principles relevant to Environmental, Social and Governance (ESG) performance.</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2022.pdf</p> <p>Further information is available at:</p> <p>https://www.granges.com/sustainability/ethical-business-practices</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented the Environmental, Health and Safety (EHS) Policy and the Gränges Americas Environmental Policy:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/2021-environmental-policy_granges-americas.pdf</p> <p>Additionally, the Entity has been a member of the UN Global Compact since 2016:</p> <p>https://www.granges.com/contentassets/9f6ea2450abc4ee2ad1ce67f6d7bd8b8/161020-granges-press-release</p>
2.1b Environmental, Social, and	Conformance	The Entity has implemented the Environmental, Health

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Governance Policy (senior management)		and Safety (EHS) Policy and Environmental Policy, which have been approved and periodically reviewed by the Entity's Senior Management.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has publicly disclosed the Environmental, Health and Safety (EHS) Policy and Environmental Policy on the Entity's website, internally via intranet and on boards within the Entity:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/2021-environmental-policy_granges-americas.pdf</p>
2.2 Leadership	Conformance	The Entity has nominated the Vice Chief Engineer as the senior Management Representative with the overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has ISO 14001 certification for its Environmental Management System for all units within its Certification Scope:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/10.-certifikat/huntingdon_14001.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/10.-certifikat/iso14001_grangesamericas_salisbury_2021.pdf</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/10.-certifikat/c0482541-em1.pdf</p> <p>Copies of valid certificates and the latest audit reports are retained by the Entity.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established a Social Management System that complies with corporate and fundamental values for Workers, including diversity and inclusion, gender assessment and well-being for all Workers. The Entity reports its performance and targets for these areas:</p> <p>https://www.granges.com/sustainability/framework-and-targets/targets-and-target-fulfilment</p> <p>The Entity has been a member of the UN Global Compact since 2016:</p> <p>https://www.granges.com/contentassets/9f6ea2450abc4ee2ad1ce67f6d7bd8b8/161020-granges-press-release</p>
2.4 Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy and the Supplier Code of Conduct which is available on the Entity's website and is made available to Suppliers during the approval/assessment of supply risks:

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		<p>https://www.granges.com/sustainability/responsible-and-sustainable-sourcing https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp17_granges-supplier-coc_20220525.pdf</p> <p>The Entity undertakes Due Diligence assessments through the Ecovadis platform (https://ecovadis.com).</p>
2.5 Impact Assessments	Conformance	<p>The Entity has established the 'Gränges Environmental Aspects' procedure that addresses safety, health, and environmental aspects (or impacts) associated with activities, products, and services that Gränges Americas can control or which it may have an influence on. Its purpose is to identify these aspects and determine those that may have a significant impact and be used in setting objectives and risk reduction activities. The Human Rights Impact Assessment is in the Code of Conduct (section 2.1) and the Global Diversity Policy.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed an Emergency Response Plan (ERP) to provide the procedures for responding to different types of emergencies which could be reasonably anticipated at the Gränges facility. The ERP is conducted in a manner, which minimises the exposure of team members to injury, and damage to plant property, the environment, and the neighbouring community and provides for the expeditious resumption of operations.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has established the 'Gränges Environmental Aspects' procedure that covers safety, health, and environmental aspects (or impacts) associated with activities, products, and services that the Entity can control or which it may have an influence on. The Entity does not have any planned mergers or acquisitions in its Strategy for the coming years.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established the 'Gränges Environmental Aspects' procedure that covers safety, health, and environmental aspects (or impacts) associated with activities, products, and services that the Entity can control or which it may have an influence on. The Entity does not have any closure, decommissioning or divestment planned in its Strategy for the coming years.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its governance approach and material environmental, social, and economic impacts since 2015 in its annual Sustainability Report.</p> <p>https://www.granges.com/sustainability/sustainability-</p>

CRITERION	RATING	COMMENT
		reporting
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed information on fines, judgments, penalties, and significant non-monetary sanctions for non-compliance with Applicable Law: https://www.granges.com/investors/financial-data https://granges.videosync.fi/2022-07-15-q2_2022
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has publicly disclosed financial information and demonstrates that all payments to governments are made on its behalf and are legal and contractual: https://www.granges.com/investors/financial-data https://granges.videosync.fi/2022-07-15-q2_2022
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 mechanisms for resolving complaints that are accessible to Workers and other interested parties. https://www.granges.com/globalassets/02.-om-granges/02.-vision-och-varderingar/220701_granges-whistleblower-function---information-and-rules.pdf https://granges.trumpet-whistleblowing.eu
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has assessed the life cycle impacts for its main product lines for which Aluminium is considered or used through the study by the Aluminum Association: https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf Additionally, the Entity makes available a carbon footprint assessment of its flat rolled Aluminium products made at its Huntingdon site and a verification report of the assessment on its website: https://www.granges.com/sustainability/sustainable-innovation-and-sales/carbon-footprint-assessments
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has demonstrated that upon customer request, the study by the Aluminum Association is made available
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly communicated LCA information and its underlying assumptions including system boundaries via the LCA report of the Aluminum Association and the carbon footprint report for the products at the Huntingdon site, and the associated verification. report:https://www.granges.com/globalassets/04.-hallbarhet/08.-hallbara-produkter/ivl-verification-report-of-granges-huntingdon-cf-calculation-model-2022-06-

CRITERION	RATING	COMMENT
		09.pdf https://www.granges.com/globalassets/04.-hallbarhet/08.-hallbara-produkter/granges-americas-carbon-footprint-report-huntingdon-20220602.pdf and https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established daily monitoring and controls to minimise the amount of scrap generated internally. The Entity has defined scrap collection and recycling mechanisms based on the properties of the scrap produced. Scrap is recycled internally, and small quantities are sold to external partners.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. Almost 100% of the scrap is recycled internally, with small quantities being sold for further processing. The Entity has established key performance indicators to monitor yield and implement corrective actions to achieve continuous in-line improvements with its quality policy and procedures.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established targets to increase the recycled content of end products, with 20% of total sourced metal inputs to be Recycled Aluminium by 2025. Further information is available in the Sustainability Report 2021, page 33: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has demonstrated involvement with local, regional, or national collection and recycling systems to support accurate measurements and efforts to increase recycling rates through agreements with end users. Granges purchases the scrap Aluminium from the end user, this includes production scrap, product returns and End of Life products. The Entity is actively involved in task forces and committees to increase the recycling rates of End of Life products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity's annual data for Greenhouse Gases (GHG) Emissions is publicly disclosed on the United States Environmental Protection Agency (USEPA) website. Please refer:

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		Huntingdon Unit: https://echo.epa.gov/detailed-facility-report?fid=110070237423 Salisbury Unit: https://echo.epa.gov/detailed-facility-report?fid=110000348927 Newport Unit: https://echo.epa.gov/detailed-facility-report?fid=110000597907
5.2 GHG emissions reductions	Conformance	The Entity has published the GHG Emissions reduction targets with a fixed term to achieve the targets. In 2018, Gränges launched a 2025 climate target to reduce carbon emissions intensity from its quantitative operations and purchased energy (Scope 1 and 2) by at least 25% compared to 2017. In 2021, Gränges disclosed a target to reduce quantitative carbon emissions intensity from sourced metal inputs (Scope 3) by at least 30 per cent compared to 2017. The Entity has a comprehensive approach to reducing the climate impact and measures total carbon emissions intensity (Scope 1, 2 and 3) as the key metric. More information is available in the Sustainability 2021 Report, pages 31-32: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
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 established systems and procedures to report Emissions to Air to national authorities and has established monitoring processes for Emissions to Air. The Entity demonstrated that all conditions were below the permit thresholds. An environmental programme is established to minimise Emissions to Air further. Emission to Air data at a Group-level is disclosed in the Gränges Sustainability Report 2021, pages 127-128. https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
6.2 Discharges to Water	Conformance	The Entity has reported its water effluents to the environmental authority. The limits set by local and national authorities for water pollutants are measured and controlled. Further information on Gränges water

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		management is in the Sustainability Report, page 129: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity had conducted spill risk assessments and implemented spill response plans for 'small' and 'significant' Spills as defined within its operating license. Spills are regularly reported to the environmental authorities.</p> <p>The Entity has the Spill Prevention, Control and Countermeasure Plan (SPCC). The SPCC Plan describes oil handling operations, spill prevention practices, discharge or drainage, controls, and the personnel, equipment and resources at the facility that are used to prevent oil spills from reaching navigable waters or adjoining shorelines.</p> <p>Regular training is provided to employees.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has established critical controls and Standard Operating Procedures in case of Spills and Leakage. The environmental risk assessment is regularly updated as part of the Entity's Integrated Management System.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has implemented spill response plans for 'small' and 'significant' Spills as defined within its operating license and includes reporting Spills to the environmental authorities. The SPCC Plan (Spill Prevention Control and Countermeasure Plan) includes spill prediction, control, and management. The Entity discloses information to all parties regarding the volume and potential impact.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>No major Spills occurred at the Entity which has required the disclosure of an Impact Assessment and remediation actions. The Environmental Management System addresses the requirement to public report Spills.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management plan in accordance with a Waste Mitigation Hierarchy. The Entity has identified waste streams and associated waste disposal methods. Hazardous and Non-Hazardous Waste are disclosed to the local authorities on an annual basis.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has disclosed annually the amount of Hazardous and Non-Hazardous Waste generated, including waste disposal methods, to the local authorities in accordance with the license requirements. Further information on Granges' waste management</p>

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		approach and plans for the reporting of data is available in the Sustainability 2021 Report, page 128: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
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 (state 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 established a procedure for Dross handling and has implemented processes to recover some of the Aluminium from Dross. The remainder is sent for recycling.
6.8b Dross (recycling)	Conformance	The Entity has demonstrated that after pressing the liquid Aluminium out of the Dross, it is sent to specialised processors to be recycled.
6.8c Dross (review of alternatives)	Conformance	The Entity has established a procedure for Dross handling and storage of any residue. No Dross residues are sent to landfill and therefore alternative options to landfilling are not required.

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PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has conducted a water risk assessment and identified its water withdrawal by source and type in consultation with relevant local Stakeholders. The operational control and annual environmental data collection are defined by each site.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the risks related to water in Watersheds in the Entity's Area of Influence. Water usage and water discharge points were identified and mapped. The Entity has engaged with relevant Stakeholders (e.g., Employees, shareholders, and authorities) to define risks and expectations. Further information on water management and corporate performance is available in the Sustainability Report 2021, page 39: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
7.2a Water management (management plans)	Conformance	The Entity has established a target as part of its water management plan to reduce its water consumption by 20% by 2025. Further information is available in the Sustainability Report 2021, page 38: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
7.2b Water management (monitoring)	Conformance	The Entity has established operational controls and an environmental monitoring plan. The progress of the water management plan is regularly reviewed during the annual management reviews.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water management approach as well as its performance against established targets in the Sustainability Report 2021, page 39: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges-sustainability-2021.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and Materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence as part of the permit process. The biodiversity risk assessment was conducted by a third party regarding the material impacts on biodiversity as a result of the Entity's activities. This report was shared with the local authorities.

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity risk assessment concluded that the Entity has no material impacts on biodiversity values.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Entity's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values.
8.3 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that may have significant adverse impacts on biodiversity through the control of packaging materials and wooden pallets.
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 the 'Granges Code of Conduct' for employees and the 'Supplier Code of Conduct' for critical suppliers. Both Codes of Conduct aim to protect the Human Rights of those who work at Granges and its critical suppliers. The Policy commitment is established and communicated and trained to all employees, with a record of training maintained. https://www.granges.com/sustainability/ethical-business-practices
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has not conducted Due Diligence for Human Rights to identify possible impacts caused by its operations within the Area of Influence of the Facilities included in the Certification Scope.
9.1c Human Rights Due Diligence (remediation)	Minor Non-Conformance	The Entity has not conducted Due Diligence for Human Rights to identify possible impacts caused by its operations within the Area of Influence of the Facilities

CRITERION	RATING	COMMENT
		included in the Certification Scope.
9.2 Women's Rights	Conformance	<p>The Entity has implemented the Gränges global Diversity Policy regarding Discrimination. The Entity has demonstrated a gender balance in the total workforce and among senior management and it is a key priority throughout the organisation. The Entity aims to expand the number of women in 'blue-collar' and 'white-collar' positions and strives to develop and provide career opportunities for women and build a greater internal flow of female candidates when recruiting for senior management positions.</p> <p>The Entity is committed to and promotes equal opportunities, diversity and gender equality and works toward the global 2025 target to have at least 30 per cent women in senior management: https://www.granges.com/sustainability/diverse-and-high-performing-teams/diversity-and-inclusion</p>
9.3 Indigenous Peoples	Conformance	There are no Indigenous tribes in the Entity's Area of Influence or impacted by its operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous tribes in the Entity's Area of Influence or impacted by its operations.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented the 'Gränges Environmental Aspects' procedure and determined that there are no sites with sacred or cultural heritage value at any of its Facilities or within its Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has implemented the 'Gränges Environmental Aspects' procedure that covers safety, health, and environmental aspects (or impacts) associated with activities, products, and services that the Entity can control or which it may have an influence on. In the design of projects, the Entity demonstrates that it considers viable alternatives to avoid or minimise the possibility of physical and/or economic displacement, balancing environmental, social, and financial costs and benefits, and paying particular attention to impacts on the poor and vulnerable, including women.</p> <p>The Entity has demonstrated that there has been no physical displacement in any process conducted by the Entity.</p>
9.6b Resettlements (where unavoidable)	Conformance	The Entity has implemented a 'Gränges Environmental Aspects' procedure that covers safety, health, and environmental aspects (or impacts) associated with activities, products, and services that Gränges Americas

CRITERION	RATING	COMMENT
		can control or which it may have an influence on. The Entity has demonstrated that, so far, there has been no need for physical displacement in any process conducted by the Entity.
9.7a Local Communities (rights and interests)	Minor Non-Conformance	The Entity has not undertaken a Human Rights Due Diligence process to identify the rights and interests and possible impacts on the Local Community.
9.7b Local Communities (impacts)	Minor Non-Conformance	The Entity has not undertaken a Human Rights Due Diligence process to identify possible impacts on the Local Community.
9.7c Local Communities (livelihoods)	Conformance	The Entity has contributed to Local Communities and has maintained open dialogue. The Entity offers local employment with good working conditions and a safe working environment. The Entity contributes to charitable causes and sponsorships, at the local level and in the locations where it operates. The Entity sponsors education, cultural events, local sports clubs, sports competitions, and various non-profit organisations.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a Responsible Sourcing Policy and conducts a social Impact Assessment to ensure it does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs): https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp16_global-responsible-sourcing-policy_final-20210127.pdf
9.9 Security practice	Conformance	The Gränges' Global Code of Conduct outlines ethical principles and guides employees to act and conduct business responsibly. The Code of Conduct applies to all employed security staff.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has implemented the Gränges Code of Conduct, which respects the rights of Workers to associate freely in Labour Unions and seek representation: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2022.pdf
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has implemented the Gränges Code of Conduct, which respects the rights of Workers to Collective Bargaining: https://www.granges.com/globalassets/04.-hallbarhet/11.-

CRITERION	RATING	COMMENT
		policyer/granges_codeofconduct_2022.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented the Granges global Human Rights Policy and Code of Conduct that prohibits the use of Child Labour. The Entity does not employ Workers under the age of 18. Apprenticeships and related safety measures are strictly implemented.
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented the Code of Conduct that includes a commitment to respect Human Rights in not using nor supporting the use of Hazardous Child Labour and in compliance with national and international legislation: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2022.pdf
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in nor support the Worst Forms of Child Labour. Child Labour is addressed in the Code of Conduct, Supplier Code of Conduct and Health and Safety Management System.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has established a Collective Bargaining Agreement and internal Human Rights practices that ensure the Entity meets its obligations to protect Workers from Forced Labour. The Entity hires its indirect workforce via recruitment agencies and conducts Due Diligence checks on recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has demonstrated it does not take any form of deposit, Recruitment Fees, or equipment in advance of Workers according to the Collective Bargaining Agreement and local employment policies. The Entity is committed to Due Diligence reviews of recruitment agencies (where applicable) to ensure they meet these expectations and are compliant with US law.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented a Policy that expresses the commitment to respect Human Rights and does not support Human Trafficking directly or through any employment or recruitment agency. Migrant Workers are not required to make deposits or deposit payments at any time.
10.3d Forced Labour (debt	Conformance	The Entity has demonstrated through its Collective

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bondage)		Bargaining Agreement and Policies, Human Rights instructions, and practices that it meets its obligations to protect Workers. The Entity hires indirect labour through recruitment agencies and conducts Due Diligence checks of recruitment agencies as needed. The Entity does not grant any loans to Workers and does not hold Workers in Debt Bondage or force them to work to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of the Workers. The employment contracts establish the conditions of the notice period in line with the Collective Bargaining Agreement.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has demonstrated through its Collective Bargaining Agreement and internal Human Rights practices it meets its obligations to protect Workers. The Entity hires indirect labour through recruitment agencies and conducts Due Diligence checks on Recruitment agencies. The Entity takes copies of Workers' identity documents for their files and adheres to strict protection rules.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers are free to terminate their employment according to the notice period and conditions governed by the Collective Bargaining Agreement and established in employment contracts in accordance with US law.
10.4 Non-Discrimination	Conformance	The Entity has developed and implemented an Equal Employment Opportunity Policy and implemented the Granges global Code of Conduct addressing zero tolerance to discrimination: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2022.pdf Further information on the Entity's diversity performance is available in the Sustainability Report, page 132: https://www.granges.com/sustainability/sustainability-reporting
10.5 Communication and engagement	Conformance	The Entity operates a joint Health and Safety Committee where issues can be raised by Workers and discussed with senior management. These mechanisms are established at the department level for each workshop. The Entity has open and inclusive communication between management, Workers and Union representatives and is formalised within the Collective Bargaining Agreement. The Entity conducts regular employee surveys.
10.6 Disciplinary practices	Conformance	The Entity has implemented a Code of Conduct relating

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		to disciplinary practices that conform with international conventions and best practices. The Entity has implemented a grievance mechanism and has qualified managers to investigate any potential breach of the Code of Conduct.
10.7a Remuneration (living wage)	Conformance	The Entity follows the required Department of Labor wage law. All employees are paid above the legal minimum wage. Gränges Salisbury negotiated wages during management and union negotiations.
10.7b Remuneration (method of payment)	Conformance	The Entity has made payments to Workers directly into the bank accounts chosen by Workers monthly. The Entity has paid salaries and benefits according to the Employment Contract and Collective Union Agreement. This was verified through a sample of employee records and interviews with the Workers.
10.8 Working Time	Conformance	The Entity has demonstrated that it respects the rights of Workers. The Collective Bargaining Agreement ensures Worker do not exceed the maximum extra shifts and total working hours per month. Shift patterns are agreed upon within the Collective Bargaining Agreement. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to US law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Environmental, Health and Safety (EHS) Policy approved by the Senior Management and supported by the provision of resources: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an EHS Policy that is made available to all Workers and visitors through notice boards and during introductory training. Annually all Workers undergo training on the 'Gränges Platform Academy.'
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an EHS Policy approved by the Senior Management and includes the commitment to comply with the Applicable Legislation for the Health and Safety of Workers.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an EHS Policy that includes Workers having the right to understand the hazards and safe practices of their work and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has established a documented Occupational

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		Health and Safety (OH&S) Management System that demonstrates conformance with applicable national and international standards and annually undergoes corporate audits by the Granges Group. The EHS Policy outlines this requirement: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf
11.3 Employee engagement on health and safety	Conformance	Health and Safety Committee are established, and Workers can raise, discuss, and participate in the resolution of OH&S issues with the administration monthly. The Entity uses hazard identification cards, behaviour-based safety audits and other OH&S internal audits to further provide the opportunity to raise health and safety issues.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance through Key Performance Indicators (KPIs) that are reviewed monthly with Facility management. The Human Resources Management team tracks and posts all required Occupational Safety and Health Administration (OSHA) injury logs and data.

Document Control and Version History

Revision	Date	Notes
0	6 December 2022	Initial Certification Audit – Full Certification