
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

REAL ALLOY – COLDWATER NORTH AND SOUTH FACILITIES

CERTIFICATE
NUMBER

231

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

ERM
CERTIFICATION
AND
VERIFICATION
SERVICES

DATE OF ISSUE

29 NOVEMBER 2022

DATE OF EXPIRY

28 NOVEMBER 2025

CERTIFIED SINCE

29 NOVEMBER 2022

AUTHORISED BY

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

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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

Recycling of aluminum scrap and production of wrought and cast alloys according to customer specification at Coldwater North and South facilities in Michigan (USA), plus central strategic and administrative functions managed by REAL ALLOY Headquarters in Ohio (USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	REAL ALLOY
ENTITY NAME	REAL ALLOY Coldwater North and South Facilities
CERTIFICATION SCOPE	Recycling of aluminum scrap and production of wrought and cast alloys according to customer specification at Coldwater North and South facilities in Michigan (USA), plus central strategic and administrative functions managed by REAL ALLOY Headquarters in Ohio (USA).
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
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">2 – 6 May 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 October 2022
AUDIT SCOPE	<p>The audit scope included the production and all operations at REAL ALLOY Coldwater North and South plants, and strategic and administrative functions at REAL ALLOY Headquarters.</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>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ 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	29 November 2022 – 28 November 2025
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	28 November 2025
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CERTIFICATE NUMBER	231
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented work procedures and an internal system to review laws and regulations and to manage compliance obligations. The system is applied to health, safety and environment legislation and other legislation related to the Entity's operations. The operating permit is current with all requirements concerning environmental emissions which are in effect and for which compliance will need to be demonstrated.
1.2 Anti-Corruption	Conformance	The Entity has established Anti-Corruption measures that are approved by the highest management level and are implemented at all relevant corporate levels. The documented and mature program is established to mitigate the risks of anti-corruption, including providing training, formal approval procedures and procedures for increased monitoring of reported situations.
1.3 Code of Conduct	Conformance	The Entity has implemented an organisation-wide Code of Conduct, that includes relevant principles for Environmental, Social and Governance (ESG) performance. Human Resources, Corporate Legal and Management are the primary contacts for providing advice and receiving complaints or concerns regarding the Code of Conduct. A reporting and whistleblowing mechanism is available to Stakeholders to share their concerns anonymously and confidentially.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy that is supported by developed and implemented systems, procedures and processes that conform to the ESG policy and governance policy requirements. This Policy is reviewed annually and communicated to all sites.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has the endorsement of and support from senior management in order to provide sufficient resources for regular review of policies. Senior management endorses, supports through provision of resources and regularly reviews the Policy.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its relevant ESG Policies internally and externally. The Entity's Policy is available to internal and external stakeholders to raise awareness of the Entity's commitments.

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has appointed a management representative with overall responsibility and authority for conformance with the ASI Performance Standard, and with identified support to ensure implementation and ongoing achievement.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented the integrated Health, Safety, Environment and Communities (HSEC) Management System and conducts business conformance audits against the requirements of the Management System. REAL ALLOY has certified Management Systems aligned with ISO 14001.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented the integrated Health, Safety, Environment and Communities (HSEC) Management System that supports developed and implemented processes to conform to national legislative and company social policy requirements. The Entity has endorsement and support from senior management through the provision of resources and regular review at the corporate level. The systemized approach that exists to enforce social and Human Rights related policies is well established as part of the overall HSEC approach.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy that covers environmental, social and governance issues. Procurement is a part of the Real Alloy central procurement framework, further defined in the corporate Code of Conduct, and procurement policies for goods and services are followed. Due Diligence checks are completed as part of the supplier assessment process.
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural, and Human Rights Impact Assessments. There is awareness within the Entity of the requirements in the event of New Projects or Major Changes, including for gender balance, and there are policies and processes that address environmental, social and economic needs in this regard.
2.6 Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan that was developed in collaboration with relevant stakeholder groups. Emergency drills are conducted annually and are established for 2022. Training records are maintained for fire training and hazardous material response (chlorine) for employees and the local fire department.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity has implemented the group Project Evaluation Standard and associated Due Diligence processes to manage mergers and acquisitions. Environmental, social and governance issues are covered and documented in this process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented the Group processes that define projects and closures. The Entity's Management System addresses closures, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social, and economic impacts both on its website and via the annual Real Alloy Sustainability Report: https://www.realalloy.com/na/downloads/sustainability#
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed incidents and non-compliances with Applicable Law in its public sustainability reporting. Government regulations, environmental regulations and individual site environmental licenses determine what is a breach and what is significant to report. All breaches are ranked using a standard severity matrix and escalated if either major or catastrophic. REAL ALLOY also publicly discloses information on significant fines, judgments, penalties and other sanctions in the Annual Reports and Sustainability Reports.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures, and processes to ensure that payments are made only on a legal or contractual basis. The Real Alloy Code of Conduct prohibits Bribery, Corruption, and fraud in all its forms, including payments to governments, and includes obligations to avoid, disclose and manage conflicts of interest. The Real Alloy group requirement is communicated to all employees via the Code of Conduct, which specifies that no donations to political parties/other are allowed. The Real Alloy Code of Conduct is available on the website: https://www.realalloy.com/na/downloads/code-of-conduct-and-ethics#
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 an accessible, transparent, understandable, and culturally and gender sensitive, Complaints Resolution Mechanism to address

CRITERION	RATING	COMMENT
		stakeholder complaints, grievances and requests for information. The process is suitable for the number and nature of the complaints and grievances received to date.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity references the Life Cycle Assessment (LCA) by the Aluminum Association, which details many aspects of the Aluminium value chain. This includes 'The Environmental Footprint of Semi-Fabricated Aluminum Products in North America' published in 2022. Real Alloy North America has contributed to these LCA's by sharing information and data as a member organisation. Real Alloy is in the process of formalising their own LCA process.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity references the LCA by the Aluminum Association. Additionally, the Entity has developed and made available a spreadsheet that is used to calculate their carbon emissions that is available to customers upon their request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity references the LCA by the Aluminum Association, which is publicly available and contains all the information on assumptions and boundaries.
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 minimized the generation of Process Scrap and achieved the target 100% collection, recycling and re-use of this scrap within its own operations.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has separated Aluminium alloys by grade or material type, both for raw materials and finished goods.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a recycling business, the Entity engages with scrap aggregators to purchase Aluminium scrap of all types. The Entity has implemented its sustainability performance procedure.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has formally engaged with local, regional and national collection and recycling systems to support accurate measurement and efforts to increase recycling rates, including participation in an Aluminum Association marketing campaign on recycling.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has disclosed its Greenhouse Gas (GHG) Emissions data, based on 2021 data, in the Real Alloy North America Sustainability Report: https://www.realalloy.com/na/downloads/sustainability# Additionally, this data is published in the US EPA Greenhouse Gas Emissions Report.
5.2 GHG emissions reductions	Conformance	The Entity has disclosed its GHG Emissions reduction target in the Real Alloy North America Sustainability Report: https://www.realalloy.com/na/downloads/sustainability# Compared to GHG emission levels in 2005, total emission levels in 2021 were approximately 40% lower. The Entity's goal is to reduce the GHG intensity of its operations by 12.5% by 2026, compared against a 2021 baseline.
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 implemented work procedures to quantify air emissions and their effect on the environment. The annual quantity and summary of main effects are in included the Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf The Entity has developed a health, safety and environment risk register that captures the risks associated with air emissions. All results are discussed and reviewed at annual meetings with the Environment Agency.
6.2 Discharges to Water	Conformance	The Entity has implemented work procedures to quantify water emissions and their effect on the environment. The annual quantity and summary of main effects are in included the Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf The Entity has developed a health, safety and environment risk register that captures the risks associated with air emissions. All results are discussed

CRITERION	RATING	COMMENT
		and reviewed at annual meetings with the Environment Agency.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity regularly assesses major and minor risks related to environmental aspects, including potential Spills and Leakage from the production as prescribed in its internal risk assessment and aspects processes and managed via the ISO 14001 certified Management System.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has an ISO 14001 certified Management System to manage the prevention, detection and minimization of Spills and Leakages. For major incidents, a response team has been resourced and trained to work alongside the local emergency response service.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented procedures and a system to report internally and externally on significant Spills and potential impacts.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented processes to publicly disclose information on Spills of a significant nature, including their impact and remedial action taken.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a Waste Management Plan and has implemented a system that focuses on waste reduction, recycling and reuse.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has disclosed the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods in the Real Alloy North America Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.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.

CRITERION	RATING	COMMENT
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 implemented programs and processes that maximise the recovery of Aluminum by treatment of Dross and Dross residues.
6.8b Dross (recycling)	Conformance	The Entity has implemented programs and processes that maximise the recovery of Aluminum by treatment of Dross and Dross residues. Dross is transported to facilities within the Real Alloy group for recovery and quantities are recorded.
6.8c Dross (review of alternatives)	Conformance	The Entity has reviewed internal processes on Dross residues, however, landfilling Dross waste is the only available method at this time. The Entity has demonstrated that they regularly review alternative options to landfilling, including projects related to processes or equipment that can be upgraded to handle a greater variety of the stream.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has implemented programs and processes to identify and map its water withdrawal and use by source and type. This is detailed in the Real Alloy Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented programs and processes to assess water-related risks within Watersheds located in the Entity's Area of Influence. This is detailed in the Real Alloy Sustainability Report.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as the risk assessment determined water-related risks to be low. However, the Entity has programs and processes to detail their efforts to implement water management plans.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as the risk assessment determined water-related risks to be low. However, the Entity has programs and processes to detail their efforts to monitor the effectiveness of water usage plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has implemented policies and procedures to disclose water usage and risks. The Entity reports water withdrawal and use and discloses material water-related risks in their annual Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in their Area of Influence. The Entity has conducted a biodiversity study, undertaken by a third party, and reported the results of the study in their annual Sustainability Report: https://www.realalloy.com/fileadmin/user_upload/na/downloads/sustainability/200422_REAL_ALLOY_Sustainability_Report_2021_North_America.pdf
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the assessment determined that the Entity does not have material impacts on biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the assessment determined that the Entity does not have material impacts on biodiversity.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the assessment determined that the Entity does not have material impacts on biodiversity.
8.3 Alien Species	Conformance	The Entity has conducted a biodiversity survey, undertaken by a third-party consultant, which determined there were no Alien Species risks identified from the Entity's operations. The Entity continues to monitor the situation.
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.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	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 conducted a structured Human Rights compliance self-assessment, using the United Nations Global Compact Self Assessment Tool. There was no indication of material or systematic non-compliances with their Code of Conduct or Human Rights in general. The Code of Conduct is available on the website: https://www.realalloy.com/na/sustainability#
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a structured Human Rights compliance self-assessment, using the United Nations Global Compact Self Assessment Tool. There was no indication of material or systematic non-compliances with their Code of Conduct or Human Rights in general.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted a structured Human Rights compliance self-assessment, using the United Nations Global Compact Self Assessment Tool. There was no indication of material or systematic non-compliances with their Code of Conduct and Human Rights in general.
9.2 Women’s Rights	Conformance	The Entity has conducted a structured Human Rights compliance self-assessment, which includes Women’s Rights, using the United Nations Global Compact Self Assessment Tool. There was no indication of material or systematic non-compliances with their Code of Conduct and Human Rights in general.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity has reviewed the demographic data for the areas in which they operate, and have not identified Indigenous People near the facilities or that are affected by their operations.
Not Applicable	Not Applicable	This Criterion is not applicable as the Entity has reviewed the demographic data for the areas in which they operate, and have not identified Indigenous People near the facilities or that are affected by their operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as the Entity has reviewed the demographic data for the areas in which

CRITERION	RATING	COMMENT
		they operate, and have not identified Indigenous People or areas of cultural heritage.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as the Entity has not required Resettlements.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as the Entity has not required Resettlements.
9.7a Local Communities (rights and interests)	Conformance	The outcome of the Human Rights Due Diligence conducted by the Entity has not identified the presence of issues affecting Local Communities.
9.7b Local Communities (impacts)	Conformance	The outcome of the Human Rights Due Diligence conducted by the Entity has not identified the presence of issues affecting Local Communities.
9.7c Local Communities (livelihoods)	Conformance	The outcome of the Human Rights Due Diligence conducted by the Entity has not identified the presence of issues affecting Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not in a Conflict-Affected or High-Risk Area and do not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity works in close partnership with the local law enforcement agencies to ensure that Human Rights and security issues are promptly addressed.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference. This commitment is made in the Real Alloy Code of Conduct.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, participate in any collective bargaining process in good faith, and adhere to collective bargaining agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity does not operate in countries where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and requires a basic minimum working age of 16 years. The Supplier Sustainability Policy outlines the Entity's expectations for suppliers.
10.2b Child Labour (hazardous)	Conformance	The Entity neither engages in nor supports the use of Forced Labour, including Hazardous Child Labour.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	The Entity neither engages in nor supports the use of Forced Labour, including the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour, including Human Trafficking either directly or through any employment or recruitment agencies. Employee interviews did not indicate the use of Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor supports the use of Forced Labour, including requiring any form of deposit, recruitment fee or equipment advance from Workers. Employee interviews did not indicate the use of Forced Labour.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not require Migrant Workers to lodge deposits or security payments at any time. Employee interviews did not indicate the use of Forced Labour.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not hold Workers in Debt Bondage or force them to work in order to pay off a debt. Employee interviews did not indicate the use of Forced Labour.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not unreasonably restrict the freedom of movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports the use of Forced Labour and 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 ensures equal opportunities and does not engage in nor support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. Employment opportunities are based on ability, potential and performance.
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 threat of

CRITERION	RATING	COMMENT
		reprisal, intimidation, or harassment. Workers have access to their rights and policies via the Entity's website: https://www.realalloy.com/na/sustainability#
10.6 Disciplinary practices	Conformance	As confirmed by Worker interviews, the Entity does not engage in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. This is formalised in the Code of Conduct.
10.7a Remuneration (living wage)	Conformance	The Entity has ensured that wages paid for a normal working week meets at least a legal or industry minimum standard. Remuneration is based on legal requirements, market data and existing collective agreements. The Entity is in full compliance with the State of Michigan Wage and Hour Laws.
10.7b Remuneration (method of payment)	Conformance	The Entity provides wage payments that are timely, in legal tender and fully documented. The Entity is in full compliance with the State of Michigan Wage and Hour Laws.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Overtime is paid according to local legal requirements. The Entity is in full compliance with the State of Michigan Wage and Hour Laws.
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 Policy is regularly reviewed and senior management has endorsed and supports the Policy through provision of resources.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies the Occupational Health and Safety Policy to all Workers and Visitors present in any area or activities under their control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an Occupational Health and Safety Policy that includes a commitment to comply with all applicable environmental, health and safety laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Workers' right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work has been included in the Entity's policies, procedures and trainings.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is routinely independently audited for conformance with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. There is also a hotline system available where Workers can anonymously raise occupational health and safety issues with management via phone or internet .
11.4 OH&S performance	Conformance	The Entity has collected, evaluated and reported on its Occupational Health and Safety performance using lagging and leading indicators and compares this with peers and best practices.

Document Control and Version History

Revision	Date	Notes
0	29 November 2022	Initial Certification Audit – Full Certification