

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ALUDIUM TRANSFORMACIÓN DE PRODUCTOS ALICANTE

CERTIFICATE  
NUMBER

56

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

13 DECEMBER 2022

DATE OF EXPIRY

12 DECEMBER 2025

CERTIFIED SINCE

13 DECEMBER 2019

AUTHORISED BY

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

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

CERTIFICATION SCOPE

The Aludium Alicante plant (Spain), including  
casthouses, semi-fabrication (Cold Rolling &  
Finishing), Aludium's R&D Center (Cindal) and  
administrative facilities.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Aludium
ENTITY NAME	Aludium Transformación de Productos Alicante
CERTIFICATION SCOPE	The Aludium Alicante plant (Spain), including casthouses, semi-fabrication (Cold Rolling & Finishing), Aludium's R&D Center (Cindal) and administrative facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (14 – 18 October 2019)</li><li>• Re-Certification Audit (25 – 27 October 2022)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 14 – 18 October 2019 (Certification Audit)</li><li>• 25 – 27 October 2022 (Re-Certification Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 14 November 2019 (Certification Audit)</li><li>• 15 December 2022 (Re-Certification Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 18 October 2019)</u></p> <p>The Aludium Alicante plant, including casthouses, semi-fabrication, Aludium's R&amp;D Center (Cindal) and administrative facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (25 – 27 October 2022)</u></p> <p>The Aludium Alicante plant, including casthouses, semi-fabrication, Aludium's R&amp;D Center (Cindal) and administrative facilities.</p>

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Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

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

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AUDIT  
OUTCOME

- Certification
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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

13 December 2022 – 12 December 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

12 December 2025

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CERTIFICATE  
NUMBER

56

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented systems to ensure legal compliance is managed by a competent legal team. These systems collect legal developments from specialised external sources and are supported by specialised legal firms.</p> <p>The Entity has defined policies and procedures to ensure the identification of risks and compliance with applicable legislation that allow communication to all persons. This process is led by the Compliance Board, is audited, and is reviewed annually by external consultants and auditors. Legal compliance assessments are conducted on an ongoing basis throughout the year, with at least annual assessments.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity maintains a zero-tolerance policy in relation to acts of bribery and corruption in its Code of Conduct, page 14, section 4 - Doing Business with Integrity, available at: <a href="https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf">https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</a></p> <p>The Entity has designated a compliance department and structure, led by a Compliance Body, which investigates complaints related to breaches of the Code of Conduct, or legal breaches.</p> <p>The Entity has carried out and updates a risk analysis of anti-Corruption and criminal offences, giving rise to an action plan for their control. The Entity trains people in antitrust and anti-Corruption values and policies.</p> <p>The Entity has deployed a compliance procedure to monitor compliance and identify no legal breaches or critical breaches. This procedure includes the implementation of a whistleblowing channel.</p>
1.3 Code of Conduct	Conformance	<p>The Entity's Code of Conduct is reviewed annually and is available at: <a href="https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf">https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</a></p> <p>The Code of Conduct has been communicated to all employees. The Entity has deployed a whistleblowing channel for suspected breaches of the Code of Conduct.</p> <p>The Code of Conduct is communicated to the Entity's suppliers in the terms and conditions of</p>

CRITERION	RATING	COMMENT
		purchase, available at: <a href="https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf">https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf</a> and in English <a href="https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf">https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and certified ISO 14001, ISO 45001 and ISO 50001 management systems, which deploy quality, health and safety, environmental and energy efficiency policies aligned with the requirements of the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The quality, health and safety, environmental and energy efficiency policies are approved by senior management and are reviewed at least annually as part of management reviews of the Management Systems, where they assess and decide on the provision of resources for the maintenance and improvement of the Management Systems.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its policies internally by email and through training to all its employees. The Entity communicates its policies externally at: <a href="https://aludium.com/sostenibilidad">https://aludium.com/sostenibilidad</a>
2.2 Leadership	Conformance	The Entity has designated a manager as the manager of the ASI process and its implementation in the organisation. The authority and responsibility of this manager have been verified and are supported by a Management Team with functions defined by Management System procedures and have received training to lead the implementation of the requirements of the ASI standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and certified an ISO 14001 environmental management system. The certificate is valid.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented an ISO 45001 health and safety management system, which is compliant in scope and Area of Influence and has a valid certificate. On the social side, the Entity evidences a social commitment and an action plan that is deployed, monitored and updated.
2.4 Responsible Sourcing	Conformance	The Entity has implemented and communicated a Standard Suppliers Policy, which is published on the website: <a href="https://aludium.com/aludium">https://aludium.com/aludium</a>

CRITERION	RATING	COMMENT
		<p>The Entity's purchase orders are accompanied by general purchasing conditions, which are accessible at: <a href="https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf">https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf</a> and in English <a href="https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf">https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf</a></p> <p>The Entity has implemented a supplier selection and evaluation procedure that takes into account environment, health, and safety (EHS) criteria and compliance with its code of conduct and policies.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has implemented environmental, social, cultural and Human Rights Impact Assessment methods, including a gender analysis, for its new projects or major changes to existing Facilities. The Entity has implemented the following impact assessment methods: compliance assessment, internal Human Rights risk assessment process, equality plan, for new major projects risk evaluation method - Capex (Capital Expenditure), and major projects FMEA (Failure Mode and Effect Analysis) risk analysis, environmental and health and safety risk control for substantial changes to Facilities.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has implemented a Health, Safety and Environment (HSE) management system that deploys procedures for risk analysis and implementation of emergency plans. The Entity has implemented an internal emergency plan with specific rules for each type of emergency and carries out simulation exercises to assess the effectiveness of this plan. The Entity provides emergency training to its employees, subcontractors and employees of contracting agencies and has adequate emergency response teams in place.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has a procedure in place in accordance with Organisation for Economic Co-operation and Development (OECD) guidelines that apply in the case of new acquisitions and mergers. No Mergers and Acquisitions have taken place over the life of the Entity.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has a procedure in accordance with OECD guidelines that apply in the case of Closure, Decommissioning and Divestment. The Entity evidences that no Closure, Decommissioning and</p>

CRITERION	RATING	COMMENT
		Divestment has taken place over the life of the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity makes public its governance approach and its material environmental, social and economic impacts in the Sustainability Report: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p> <p>The Entity also informs the authorities of its environmental, health and safety and social management approach in the 'Statement of Non-Financial Information' document.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has communication processes in place to publicly disclose information on significant fines, judgements, penalties and non-monetary sanctions for non-compliance with Applicable Laws.</p> <p>As part of the HSE management system, a communication procedure has been defined to manage communications and has verification processes in place that integrate communication with Stakeholders.</p> <p>The Entity has not received significant fines, sentences, penalties, and non-monetary sanctions for non-compliance with applicable legislation.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has procedures in place for the identification of tax legislation such as the compliance procedure. In addition, the Entity has external advisors to ensure that it is aware of and complies with tax and labour legislation.</p> <p>All contracts prepared by the Entity include an explicit commitment to compliance and legal liability. The Entity has processes in place to comply with payments required by authorities and legislation.</p>
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	<p>The Entity has communication processes in place to manage claims, complaints and requests for information from customers and suppliers, authorities, employees, trade unions and members of the community. These processes have appropriate grievance resolution mechanisms in place that are accessible, transparent, understandable and culturally and gender sensitive, to deal with complaints, grievances and requests for information from Stakeholders in relation to its</p>

CRITERION	RATING	COMMENT
		<p>operations.</p> <p>There have been no Stakeholder complaints received to date.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has performed a Life Cycle Assessment (LCA) assessing the impact of its operations. This LCA has been undertaken by a competent consultant and is based on recognised standards and database.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has implemented a procedure for the communication of the LCA report to customers or Stakeholders who request it. As of the date of this audit, neither clients nor Stakeholders have requested the LCA.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity publishes information on the impacts of the LCA analysis and its sustainability strategy and performance in the Sustainability Report which is published at: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p>
4.2 Product design	Conformance	<p>The Entity manufactures products in accordance with EN standards with a market focus and under the strategy of optimising the resources used and the goal of obtaining a zero scrap target and the reduction of GHG emissions. The Entity evidences the implementation of this strategy through the results achieved in recent years, which are published in the Sustainability Report: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has implemented a Circular Economy strategy and the optimisation of its processes with the goal of zero scrap. In turn, it has implemented and certified an ISO 14001 management system that deploys the scrap management processes. The results achieved in recent years are published in the Sustainability Report, available at: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p> <p>The Entity's recycling strategy is based on a series of initiatives ranging from the development of alloys and their recycling to investment in recycling technologies such as rotary furnaces and multi-chamber furnaces to process more types of scrap. All scrap generated during the production process is reused by the Entity, being sorted and recovered. In 2022, the control of scrap flows has been</p>



CRITERION	RATING	COMMENT
		reinforced through the implementation of the ASI Chain of Custody system.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has implemented and certified an ISO 14001 Management System that deploys the scrap management processes, being part of these processes the alloy segregation standard for the different machines/machine groups of the production process.</p> <p>The Entity segregates alloys to optimise production processes and the generation and recycling of scrap. In 2022, the control of scrap flows has been reinforced through the implementation of the ASI Chain of Custody system</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has implemented a Circular Economy strategy and the optimisation of its processes with the goal of zero scraps. The results achieved in recent years are published in the Sustainability Report at: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p> <p>The Entity's recycling strategy sets targets and action plans based on a series of initiatives ranging from the development of alloys and their recycling to investment in recycling technologies such as rotary kilns and multi-chamber furnaces to process additional types of scrap.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity is an active member of ARPAL, a not-for-profit association to promote the recycling of aluminium packaging and achieve the recycling rates required by legislation. ARPAL communicates the results achieved in the recycling rate of aluminium packaging in Spain over the last few years. The Entity has a strategy to increase the recycling processes together with its customers, evidencing agreements in this respect.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has implemented and certified an ISO 14001-ISO 50001 management system with procedures for the control of GHG emissions and energy consumption by energy source.</p> <p>The Entity publishes annual data on GHG emissions and energy consumption in the Sustainability Report, page 22: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has implemented and certified an ISO 14001-ISO 50001 management system with</p>

CRITERION	RATING	COMMENT
		<p>procedures for the establishment of objectives and actions related to direct and indirect emissions and energy consumption.</p> <p>The Entity publishes annually the objectives, actions and results in direct and indirect emissions in the Sustainability Report, page 14:  <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a></p>
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	<p>The Entity has implemented and certified an ISO 14001 management system with procedures for monitoring air emissions and reporting them to Stakeholders.</p> <p>The Entity annually reports air emissions data to the environmental authority through different mechanisms.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has implemented and certified an ISO 14001 management system with procedures for the control of discharges into water and their communication with Stakeholders.</p> <p>The Entity reports annually to the environmental authority the data on discharges into water through different mechanisms.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has implemented and certified an ISO 14001 management system with procedures for the evaluation and management of spills and leaks, as well as their communication with Stakeholders.</p> <p>The Entity has implemented procedures for the management of spills and leaks, which are part of the Internal Emergency Plan. Based on these procedures, it identifies the areas with the highest risk of spills and determines an action sheet for each risk.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity communicates externally to Stakeholders its performance on spills and leaks.</p> <p>The Entity determines an action sheet for each risk and carries out control and surveillance actions to prevent and detect risk situations.</p>

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for reporting spill incidents to Stakeholders. The Entity externally communicates its spill performance to Stakeholders. There have been no complaints or regulatory sanctions relating to spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports externally on spill incidents annually in its Sustainability Report, page 14: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a> The Entity also reports externally on the website of the environmental authorities EPTR on agreed spill data at: <a href="http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126">http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for the management of waste which describe the system to be followed in the management of the waste generated. The Entity has developed a waste management strategy that has been prepared in accordance with the Waste Mitigation Hierarchy, indicating an order of preference for action to reduce and manage waste. Waste management at each plant defines and includes the control and progression of materials through the successive processes and stages of waste management, taking into account the life cycle of the product.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity reports annually on the amount of Hazardous and Non-Hazardous Waste generated, as well as on the methods of waste disposal. For more information see the Sustainability Report, page 20: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a> The Entity reports to the environmental authorities on the website of the environmental authorities EPTR, the agreed landfill data: <a href="http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126">http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126</a>
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.

CRITERION	RATING	COMMENT
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Dross generated at the Entity is processed in the rotary furnace. The Salt Slag and the waste from the rotary furnace are taken to authorised waste managers where it is fully recovered. The latest investments in the Entity demonstrate that the installation of a rotary furnace has made it possible to treat the Dross generated.
6.8b Dross (recycling)	Conformance	The Dross generated at the Entity is processed in the rotary furnace. The Salt Slag, the waste from the rotary furnace, is taken to authorised waste managers where it is fully recovered. Through treatment three products are obtained that are sold to the market: metallic aluminium, fluxing salt and the rest is 'Paval', a material used in the ceramics and cement industry.
6.8c Dross (review of alternatives)	Conformance	The Entity demonstrates that it periodically reviews alternative options to the disposal of slag waste, proof of which is that the Dross generated at the Entity is processed in the rotary furnace and that the Salt Slag.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for water management, identifying on a map the water supply sources and water discharge points.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment using the Aqueduct™ tool developed by the World Resources Institute (WRI). The results of this assessment are used to define water use targets and action plans for sites identified as high risk.
7.2a Water management (management plans)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for water management, establishing objectives and action plans aligned with the risks identified.
7.2b Water management (monitoring)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for water management that establishes objectives and action plans aligned with identified risks. The objectives and action plans are measured with data monthly and assessed annually in the Management Review process.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports annually on its water use performance and risks in its Sustainability Report, page 19: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a> The Entity reports its consumption data on an annual basis to the environmental authority EPRTTR at: <a href="http://www.en.prttr.es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126">http://www.en.prttr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity study completed by a competent external consultant. This study includes an assessment of the risks and materiality of the impacts of activities in the Entity's Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has defined a consultative Biodiversity Action Plan designed in accordance with the Biodiversity Mitigation Hierarchy. This plan considers actions in each of which it defines the scope, considerations, objectives, deadlines, responsible parties, and monitoring indicators.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has defined a consultative Biodiversity Action Plan designed in accordance with the Biodiversity Mitigation Hierarchy.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	The Entity reports annually on its biodiversity performance in its Sustainability Report, page 21: <a href="https://aludium.com/3d-flip-book/sustainabilityreport_2021">https://aludium.com/3d-flip-book/sustainabilityreport_2021</a>
8.3 Alien Species	Conformance	The Entity has conducted a biodiversity study that includes an assessment of the risks and materiality of the impacts of activities in the Entity's Area of Influence, including the risks of Alien Species in flora and fauna. The Entity has defined actions to protect biodiversity.
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	<p>The Entity has defined its Human Rights compliance commitments in its values, Code of Conduct and Human Rights Policy, making a public statement that it "will not contribute to or participate in any form of armed conflict or human rights abuses in conflict-affected or identified high-risk areas".</p> <p>The Entity has an ISO 45001 Health and Safety management system in place, which includes compliance with legal requirements in labour matters.</p> <p>The Entity publishes its values and commitments to Human Rights within the Code of Conduct, page 24: <a href="https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf">https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</a></p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity conducts an annual risk assessment on Human Rights according to a Human Rights compliance assessment procedure. This procedure is based on the methodology of the Danish Human Rights Institute and indicates the process to be followed based on the results obtained.</p> <p>As a complement to the process defined for</p>

CRITERION	RATING	COMMENT
		mergers and acquisitions, the Entity undertakes Due Diligence which includes human rights. Following these assessments, it is concluded that there are no Human Rights risks.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity's Due Diligence process has not identified any causes or contributions to adverse human rights impacts, and no complaints or redress processes have been initiated by Stakeholders or vulnerable groups.
9.2 Women's Rights	Conformance	The Entity has defined its commitments to ensure respect for women's rights and interests in its values, Code of Conduct, and equality plan. The Entity has implemented an ISO 45001 Health and Safety management system and an equality plan, which includes compliance with legal requirements on labour aspects of women's rights. The Entity has implemented an equality committee to monitor compliance with the equality plan. The Entity defines its values and commitments to equality within the Code of Conduct, page 12: <a href="https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf">https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</a>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples in the area where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there is no presence of Indigenous Peoples in the area where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no places of worship or sacred places in the Area of Influence of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as it has been evidenced that there has been no resettlement due to the Entity's activities. Additionally, the Entity has implemented a procedure at the group level to avoid or minimise any potential resettlement and to cover the impacts of any resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable as it has been evidenced that there has been no resettlement due to the Entity's activities. Additionally, the Entity has implemented a procedure at the group level to avoid or minimise any potential resettlement and to cover the impacts of any resettlement.

CRITERION	RATING	COMMENT
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity states in its Code of Conduct on page 24, a commitment to support and respect the interests of the community: <a href="https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf">https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</a></p> <p>The Entity has implemented a Social Action Plan through which it actively participates in the development of the communities in which it is present, through initiatives ranging from dialogue and social investments to volunteering, donations of products and services, and joint work with civil society organisations.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has implemented a Social Action Plan through which it actively participates in the development of the communities in which it is present, through initiatives ranging from dialogue and social investment to volunteering, the donation of products and services and joint work with civil society organisations.</p> <p>The Entity has developed a community action plan detailing various actions, based on contact with Local Communities to identify opportunities and channel requests or queries. The action plan is monitored through performance indicators.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity demonstrates respect for community interests in land use, livelihoods, and natural resources, evidence of economic promotion in the area, the creation of employment opportunities, including employment for people with disabilities, and training and collaboration with training organisations.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity operates in Spain which is not in a high-risk or conflict-affected area. The Entity states in its Code of Conduct on page 24, a commitment not to contribute to or participate in any form of armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity demonstrated that it did not contribute to armed conflict or human rights abuses in CAHRAs.</p>
9.9 Security practice	Conformance	<p>The Entity has signed a contract with a security company that has installed perimeter alarms to prevent intrusions in the building and with which it has signed a contract without armed guards, comply at all times with current security regulations and registered in the register of security companies. The security personnel are trained and accredited to perform the service.</p>



CRITERION	RATING	COMMENT
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures respect for the rights of Workers to freely join trade unions and seek representation and sit on works councils without interference.</p> <p>The Entity has set up a joint employee-company committee for information sharing and decision-making.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity has an approved collective agreement resulting from company-employee collective bargaining. This collective agreement explicitly includes the management of the Works Council, Trade Union Sections and Centre Assemblies. The approved agreement improves on the terms of the sector agreement and is available to all employees. The collective agreement is communicated to the Labour Authority and published at <a href="https://www.convenioscolectivos.net/wp-content/uploads/2020/01/aludium22.pdf">https://www.convenioscolectivos.net/wp-content/uploads/2020/01/aludium22.pdf</a></p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	<p>The Entity operates in Spain, where Applicable Law does not restrict the right to Freedom of Association and collective bargaining.</p>
10.2a Child Labour (minimum age)	Conformance	<p>Spanish legislation sets the minimum working age at 16 years, with special conditions. The Entity has defined in its Code of Conduct on page 26, that its policies convey that it does not tolerate child labour. The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that it does not promote or employ child labour.</p> <p>The Entity has implemented an internal Human Rights risk assessment process based on the Danish Human Rights Institute, which includes the risk of child labour.</p> <p>For internal control measures, the Entity has processes in place to control the identification and age of Workers through the provision of documents and data, this control is carried out in hiring and coordination with subcontractors or temporary employment agencies.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity does not use or support Hazardous Child Labour and has defined in its Code of Conduct, page 26, that its policies convey that it does not tolerate child labour.</p>

CRITERION	RATING	COMMENT
		<p>For internal control measures, processes are in place to control the identification and age of subcontractors and temporary employment agencies through the provision of documents and data.</p> <p>In addition, in its conditions for suppliers, the Entity requires 'Not to participate under any circumstances in employing child labour', and these conditions are published on its website.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity does not engage in or support the Worst Forms of Child Labour and has defined in its Code of Conduct on page 26, that its policies convey that it does not tolerate child labour.</p> <p>Additionally, in its conditions for suppliers, the Entity requires "Not to participate under any circumstances in employing child labour", and these conditions are published on its website.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has defined in its Code of Conduct, page 26, that its policies do not tolerate forced or compulsory labour in its global operations.</p> <p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that it does not participate in or support Human Trafficking, either directly or through any employment or recruitment agency.</p> <p>The Entity has implemented an internal Human Rights risk assessment process based on the Danish Human Rights Institute that includes the risk of Human Trafficking or Forced Labour.</p> <p>The Entity in its conditions to suppliers requires "Under no circumstances to participate in human trafficking or forced labour, such as prison labour, forced labour, chained persons, slavery or servitude", these conditions are published on its website.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, which does not allow any type of deposit, hiring fee or advance payment of equipment to be demanded from Employees, either directly or through employment or recruitment agencies.</p> <p>The Entity in its terms and conditions to suppliers requires: "ensure that employee remuneration meets or exceeds the legal minimum standard and complies with all applicable laws in full".</p>

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has approved a collective agreement that regulates all rights and obligations in labour relations, which does not allow Migrant Workers to be required to deposit bonds or security payments at any time.</p> <p>The Entity in its terms and conditions to suppliers requires "ensure that the remuneration of employees meets or exceeds the legal minimum standard and complies with all applicable laws in full".</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that employees are not held in debt bondage or forced to work to pay off debt. The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, which does not allow keeping Workers in Debt Bondage or forcing them to work to pay off a debt.</p> <p>The Entity's supplier terms and conditions require "ensuring that employee remuneration meets or exceeds the legal minimum standard and complies with all applicable laws in full".</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, which does not allow unjustified restrictions on the freedom of movement of employees in the workplace.</p> <p>The Entity's conditions for suppliers require it to "respect the human dignity and rights of workers, of each individual and the communities associated with its operations".</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has approved a collective agreement that regulates all rights and obligations in labour relations, which does not allow the retention of original copies of identity documents, work permits, travel documents or training certificates of the Employees.</p> <p>The Entity's conditions for suppliers require it to "respect human dignity and the rights of workers, of each individual and the communities associated with its operations".</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>In Spain, Workers' rights are governed by the Workers' Statute Law which regulates the right to the freedom to terminate their employment at any time without penalty, subject to reasonable notice.</p> <p>The Entity has implemented an ISO 45001</p>

CRITERION	RATING	COMMENT
		<p>management system that complies with health and safety legislation and ensures that Employees are not denied the freedom to terminate their employment at any time without penalty, subject to reasonable notice.</p> <p>The Entity has an approved collective bargaining agreement that regulates all rights and obligations in labour relations, ensuring that Employees are not denied the freedom to terminate their employment at any time without penalty upon reasonable notice.</p>
10.4 Non-Discrimination	Conformance	<p>The Entity is developing an Equality Plan, which allows for progress in achieving equality and ensures that it does not engage in or support Discrimination in the hiring, salary, promotion, training, promotion opportunities or dismissal of any Employee on the basis of sex, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that may give rise to Discrimination. The Entity has set up an "Equal Opportunities Committee" which promotes and monitors equality.</p> <p>In its conditions for suppliers, the Entity requires "Prohibit any form of discrimination or abuse of candidates or employees".</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented an ISO 45001 system for health and safety management, which includes procedures to ensure open communication and direct engagement with employees and their representatives regarding working conditions and the resolution of labour and compensation issues, without threat of retaliation, intimidation or harassment.</p> <p>The Entity has an approved collective bargaining agreement that regulates all rights and obligations in labour relations, including the right to ensure communication regarding working conditions and the resolution of labour issues.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that it does not engage in disciplinary practices, including not engaging in or tolerating the use of corporal punishment, mental or physical coercion, harassment and gender-based violence, including sexual harassment, or verbal abuse of Employees. The Entity has an approved collective bargaining agreement that regulates all rights and obligations</p>

CRITERION	RATING	COMMENT
		<p>in labour relations, including the disciplinary regime. The Entity has set up a joint employee-company committee that monitors compliance with the collective bargaining agreement.</p> <p>The Entity in its conditions to suppliers requires 'Prohibit any form of corporal punishment, harassment, discrimination or abuse of candidates or workers'.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures compliance with working conditions, including the minimum wage. The Entity has an approved collective bargaining agreement that regulates all rights and obligations in labour relations, including Remuneration based on salary scales. The Entity has set up an employee-company joint committee that monitors compliance with the collective bargaining agreement. Staff employed outside the collective agreement have a contract that ensures compliance with the minimum wage.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures compliance with labour conditions, including the method of payment of wages. The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, including the method of salary payment. The Entity has implemented an employee-company joint committee that monitors compliance with the collective agreement.</p>
10.8 Working Time	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures compliance with working conditions, including working hours. The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, including working hours. The Entity has set up an employee-company joint committee that monitors compliance with the collective agreement.</p> <p>The Entity has time control systems in place and complies with legislation and working conditions agreed with employees.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an ISO 45001 management system that determines a Health and Safety policy and ensures its communication with Stakeholders, including employees, subcontractors, employees of temporary employment agencies and Visitors. This policy includes commitments to comply with applicable legislation and to achieve an incident-free workplace, with each employee being responsible for their own and their colleagues' well-being. The HSE Policy is approved and reviewed annually by the Management.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an ISO 45001 management system that determines a Health and Safety policy and ensures its communication with Stakeholders, including employees, subcontractors, employees of temporary employment agencies and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an ISO 45001 management system that determines a Health and Safety policy. This policy includes commitments to comply with applicable legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has identified fundamental daily safety practices which include following safe work practices and proactively seeking to improve them, ensuring all safeguards are in place, adhering to all work design plans, permits, and safety operating limits, keeping the work environment clean, orderly and safe and seek help when a hazardous situation is identified.</p> <p>This Health and Safety policy includes commitments to comply with applicable legislation and to achieve an incident-free workplace, with each employee being responsible for their own and their colleagues' well-being.</p>
11.2 OH&S Management System	Conformance	The Entity has an ISO 45001 management system in place which includes an Environmental, Health and Safety Management Manual, Health and Safety Procedures (standards) and Operating Instructions. This system has a certificate in place.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented processes for the engagement of employees in Health and Safety matters. The Entity has an approved collective bargaining agreement that regulates all rights and obligations in labour relations, including those related to health and safety. This aspect of the

CRITERION	RATING	COMMENT
		agreement is monitored quarterly by a Health and Safety Committee. The Entity deploys several initiatives for employee engagement, such as a health and safety committee, a health surveillance programme, a Suggestions Programme, Safety Week and Healthy Business Initiative.
11.4 OH&S performance	Conformance	<p>The Entity has implemented processes for continuous monitoring of the effectiveness of the system through indicators, objectives, and action plans.</p> <p>The Entity demonstrates continuous improvement in the Health and Safety of its processes through action plans and the study of the best available techniques.</p>

**Document Control and Version History**

Revision	Date	Notes
0	13 December 2019	Initial Certification Audit (Full Certification)
1	31 January 2023	Re-Certification Audit