
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUDIUM TRANSFORMACIÓN DE PRODUCTOS AMOREBIETA

CERTIFICATE
NUMBER

57

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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CERTIFICATION SCOPE

The Aludium Amorebieta plant (Spain), including aluminium re-melting/refining casthouses, semi-fabrication (Hot Rolling, Cold Rolling & Finishing) and administrative facilities.

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

www.aluminium-stewardship.org

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aludium
ENTITY NAME	Aludium Transformación de Productos Amorebieta
CERTIFICATION SCOPE	The Aludium Amorebieta plant (Spain), including aluminium re-melting/refining casthouses, semi-fabrication (Hot Rolling, Cold Rolling & Finishing) and administrative facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (21 – 23 October 2019)Re-Certification Audit (10 – 21 October 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">21 – 23 October 2019 (Certification Audit)10 – 21 October 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">14 November 2019 (Certification Audit)15 December 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 23 October 2019)</u></p> <p>The Aludium Amorebieta plant, including aluminium re-melting/refining casthouses, semi-fabrication and administrative facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">CasthousesSemi-FabricationAluminium Re-melting/Refining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Re-Certification Audit (10 – 21 October 2022)

The Aludium Amorebieta plant, including aluminium re-melting/refining casthouses, semi-fabrication and administrative facilities.

Supply chain activities included in the audit scope:

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

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

13 December 2022 – 12 December 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

12 December 2022

CERTIFICATE
NUMBER

57

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, led 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 and is audited and 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, section 4- Doing Business with Integrity, available at: https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</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. The Entity has undertaken a risk analysis of anti-corruption and criminal offences, giving rise to an action plan for their control.</p> <p>The Entity has trained employees in antitrust and anti-corruption values and policies. The Entity has also deployed a compliance procedure to monitor compliance, identifying 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: https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf</p> <p>The Code of Conduct has been communicated to all employees and training has been provided. The Entity has deployed a whistle-blowing channel for suspected breaches of the Code of Conduct. The Code of Conduct is communicated</p>

CRITERION	RATING	COMMENT
		<p>to the Entity's suppliers in the terms and conditions of purchase, available at: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf and in English: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>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.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>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.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity communicates its policies internally by email and through training to all its employees. The Entity communicates its policies externally and to suppliers in the purchasing conditions, accessible at: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf and in English: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf</p>
2.2 Leadership	Conformance	<p>The Entity has designated a manager of the ASI process and its implementation in the organisation. The authority and responsibility of this manager has been verified, and this role is supported by a Management Team with functions defined by management system procedures and having received training to lead the implementation of the requirements of the ASI Performance Standard.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and certified an ISO 14001 Environmental Management System.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented an ISO 45001 Occupational Health and Safety Management System, which is compliant in scope and area of influence and has a valid certificate. For social aspects and impacts, the Entity evidences a social commitment and an action plan that is deployed, monitored and updated.
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented and communicated a Standard Suppliers Policy, which is published at: https://aludium.com/aludium/</p> <p>The Entity's purchase orders are accompanied by general purchasing conditions, which are accessible on the website: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_Spanish-v3.pdf and in English: https://aludium.com/wp-content/uploads/2021/09/ALUDIUM-General-Terms-and-Conditions_English-v3.pdf</p> <p>The Entity has implemented a supplier selection and evaluation procedure that takes into account EHS criteria and compliance with its code of conduct and policies.</p>
2.5 Impact Assessments	Conformance	The Entity has implemented various 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 for major projects - FMEA (Failure Mode and Effect Analysis) risk analysis, environmental and health and safety risk control for substantial changes to facilities.
2.6 Emergency Response Plan	Conformance	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 a self-protection plan with specific rules for each type of emergency and undertaken simulation exercises to evaluate the effectiveness of this plan.

CRITERION	RATING	COMMENT
		The Entity provides emergency training to its personnel, subcontractors and recruitment agency personnel and has adequate emergency intervention equipment.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a procedure 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 since its creation.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has development a procedure in accordance with OECD guidelines that applies in the case of closure, decommissioning and divestment. No closure, decommissioning and divestment have been undertaken since its creation.
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: https://aludium.com/3d-flip-book/sustainabilityreport_2021/</p> <p>The Entity 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. Included in the ISO 14001-ISO 45001 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 developed procedures for the identification of tax legislation such as the compliance procedure. Additionally, 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 also has implemented</p>

CRITERION	RATING	COMMENT
		processes to comply with payments required by the Authorities and legislation.
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 communication processes in place to deal with claims, complaints and requests for information from customers and suppliers. It also has implemented communication processes to manage claims, complaints and requests for information from 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 operations. There have been no stakeholder complaints received to date.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has performed a Life Cycle Assessment (LCA) assessing the impact of its operations. This LCA has been carried out by a competent consultant and is based on recognised standards and database.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	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 yet requested the LCA.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publishes information on the impacts of the LCA analysis and its sustainability strategy and performance in the Sustainability Report: https://aludium.com/3d-flip-book/sustainabilityreport_2021/
4.2 Product design	Conformance	The Entity manufactures products in accordance with EN Standards with a market focus and under the strategy of optimising the resources used and the ultimate goal of obtaining a zero scrap target and the reduction of GHG emissions.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a circular economy strategy and the optimisation of its processes with the ultimate goal of zero scrap. In turn, it has implemented and certified an ISO 14001

CRITERION	RATING	COMMENT
		<p>Management System that deploys the scrap management processes. 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.</p> <p>All scrap generated during the production process is reused by the Entity, being sorted and recovered.</p>
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, which includes the alloy segregation standard for the different machines and machine groups of the production process. The Entity segregates alloys to optimise production processes and the generation and recycling of scrap.</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 ultimate goal of zero scrap. 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 more 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 non-profit association that promotes aluminium packaging recycling and achieving 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, available at: https://aluminio.org/</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. The Entity publishes annual data on GHG emissions and energy consumption in the Sustainability Report: https://aludium.com/3d-flip-book/sustainabilityreport_2021/</p>

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	The Entity has implemented and certified an ISO 14001-ISO 50001 management system with procedures for the establishment of objectives and actions related to direct and indirect emissions and energy consumption. The Entity publishes annually the objectives, actions and results in direct and indirect emissions in the Sustainability Report: https://aludium.com/3d-flip-book/sustainabilityreport_2021/
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 and certified an ISO 14001 management system with procedures for monitoring air emissions and reporting the results to stakeholders. The Entity annually reports air emissions data to the environmental authority through different mechanisms.
6.2 Discharges to Water	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for the control of discharges into water and their communication to Stakeholders. The Entity annually reports to the environmental authority the data on discharges into water through different mechanisms.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	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 to Stakeholders. The Entity has implemented procedures for the management of spills and leaks, which are a component of the Internal Emergency Plan. The Plan identifies the areas with the highest risk of spills and determines actions for each risk.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity communicates externally to Stakeholders its performance on spills and leaks. The Entity determines actions for each risk and

CRITERION	RATING	COMMENT
		undertakes controls and surveillance actions to prevent and detect risk situations.
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 for spills received to date.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports spill incidents externally on an annual basis in its Sustainability Report. The Entity also reports spill data externally to the environmental authorities' PRTR website, available at: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3935
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management strategy that has been developed in accordance with the Waste Mitigation Hierarchy, indicating an order of preference for action to reduce and manage waste. Waste management defines and includes the control and progression of materials through the successive processes and stages of waste management.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity communicates annually on the amount of Hazardous and Non-Hazardous Waste generated, as well as the methods of Waste disposal in the Sustainability Report. In addition, the Entity reports data to the the environmental authorities' PRTR website, available at: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3935
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.

CRITERION	RATING	COMMENT
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, the waste from the rotary furnace, is taken to authorised waste managers where it is fully recovered. By treating it, they obtain three products that they sell to the market: metallic aluminium, fluxing salt and the remainder is 'Paval', a material used in the ceramics and cement industry. 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. By treating it, they obtain three products that they sell to the market: metallic aluminium, fluxing salt and the remainder is 'Paval', a material used in the ceramics and cement industry. The installation of a rotary furnace has made it possible to treat the dross generated.
6.8c Dross (review of alternatives)	Conformance	The Entity periodically reviews alternative options to the disposal of slag waste. The Dross generated at the Entity is processed in the rotary furnace.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has implemented and certified an ISO 14001 management system with procedures for

CRITERION	RATING	COMMENT
		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 monthly and assessed annually in the Management Review process.
7.3 Disclosure of water usage and risks	Conformance	The Entity annually reports on its water use performance level and risks in its Sustainability Report: https://aludium.com/3d-flip-book/sustainabilityreport_2021 In addition, the Entity annually reports its consumption data on the environmental authorities' PRTR website: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3935
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity study 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 undertaken a biodiversity study that includes an assessment of the risks and materiality of the impacts of the activities in the Entity's Area of Influence. 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,

CRITERION	RATING	COMMENT
		objectives, deadlines, responsible parties and monitoring indicators.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has undertaken a biodiversity study that includes an assessment of the risks and materiality of the impacts of the activities in the Entity's Area of Influence. The Entity has defined a consultative Biodiversity Action Plan designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The Entity annually reports its biodiversity performance in its Sustainability Report: https://aludium.com/3d-flip-book/sustainabilityreport_2021/
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 and evidence of its implementation.
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 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". The Entity has implemented an ISO 45001 management system for health and safety management, which includes compliance with legal requirements on labour issues. The Entity publishes its values and commitment to Human Rights in the Code of Conduct:

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		https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf
9.1b Human Rights Due Diligence (process)	Conformance	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. The Entity undertakes Due Diligence for human rights in the mergers and acquisitions process. 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 commitment to ensure respect for women's rights and interests in its corporate values, Code of Conduct and equality plan. The equality plan includes compliance with legal requirements on labour aspects of women's rights. The Entity has implemented an equality commission to monitor compliance with the equality plan. The Entity publishes its values and commitment to equality in the Code of Conduct: https://aludium.com/wp-content/uploads/2022/10/VF_1710_CodigodeConducta.pdf
9.3 Indigenous Peoples	Not Applicable	This requirement is not applicable as there is no presence of Indigenous Peoples where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This requirement is not applicable as there is no presence of Indigenous Peoples where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This requirement is not applicable as there are no places of worship or sacred places in the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This requirement is not applicable as it has been evidenced that there has been no resettlement due to the Entity's activity. Additionally, the Entity has implemented a procedure at Group level to

CRITERION	RATING	COMMENT
		avoid or minimise any potential resettlement and to cover the impacts of any resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	This requirement is not applicable as it has been evidenced that there has been no resettlement due to the Entity's activity. Additionally, the Entity has implemented a procedure at Group level to avoid or minimise any potential resettlement and to cover the impacts of any resettlement.
9.7a Local Communities (rights and interests)	Conformance	In its Code of Conduct, the Entity has included a commitment to support and respect the interests of the community. 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, joint work with civil society organisations.
9.7b Local Communities (impacts)	Conformance	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. The Entity has a community action plan which details various actions, based on contact with Local Communities to identify opportunities and channel requests or queries.
9.7c Local Communities (livelihoods)	Conformance	The Entity respects the Communities interests in land use and livelihoods and use of natural resources. There is 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.
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 or High-Risk Areas (CAHRAs).</p> <p>The Entity has demonstrated that it does not contribute to armed conflict or human rights abuses in CAHRAs.</p>

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has signed a contract with an unarmed security company that complies with current security regulations and is registered in the register of security companies. The security personnel are trained and accredited to perform the service.
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 to participate in Workers' councils without interference.</p> <p>The Entity has approved a collective agreement that regulates the representation of Workers and the organisation of different committees to monitor this agreement. This collective agreement explicitly includes the management of the Works Council, Trade Union Sections and Centre Assemblies.</p> <p>The Entity has also established 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 implemented an ISO 45001 management system that complies with health and safety legislation and ensures that employees have a Collective Bargaining Agreement.</p> <p>The Entity has a Collective Bargaining Agreement approved as a result of collective bargaining between the company and employees. The agreement is communicated to the labour authorities and published at: https://djr2cmq7svtp.cloudfront.net/normas/27122900.pdf</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity operates in Spain, where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	Spanish legislation sets the minimum working age at 16 years, with special conditions. The Entity has defined in its Code of Conduct, 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. The Entity has implemented an

CRITERION	RATING	COMMENT
		<p>internal Human Rights risk assessment process based on the Danish Human Rights Institute, which includes the risk of child labour.</p> <p>As internal control measures, the Entity has implemented processes to control the identification and age of Workers through the provision of documents and data, which is undertaken in hiring and in coordination with subcontractors or temporary employment agencies.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity has defined in its Code of Conduct that it does not tolerate Hazardous 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 hire Child Labour.</p> <p>As internal control measures, processes have been implemented to control the identification and age of subcontractors and Workers obtained via temporary employment agencies through the provision of documents and data.</p> <p>In addition, the Entity requires its suppliers to not participate under any circumstances in employing child labour. During the supplier control process of the ASI Chain of Custody Standard, the Entity evaluates supplier compliance with 'its Code of Conduct.</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 that it does not tolerate Child Labour in its Code of Conduct.</p> <p>As 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, the Entity requires its suppliers to not participate under any circumstances in employing child labour.</p> <p>During the supplier control process of the ASI Chain of Custody Standard, the Entity evaluates supplier compliance with 'its Code of Conduct.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has defined in its Code of Conduct, that its policies do not tolerate forced or compulsory labour in its global operations. The Entity has implemented an ISO 45001 management system that complies with health</p>

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		<p>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'.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that no deposits, recruitment fees or equipment advances are required from Employees, either directly or through employment or recruitment agencies.</p> <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.</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>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that Migrant Workers are not required to post bonds or make security payments at any time. 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 a debt. The Entity has approved a collective bargaining agreement that regulates all rights and obligations in labour relations, which</p>

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		does not allow keeping Workers in Debt Bondage or forcing them to work to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that the freedom of movement of employees in the workplace is not unreasonably restricted. 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.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has implemented an ISO 45001 management system that complies with health and safety legislation and ensures that it does not retain original copies of employees' identity documents, work permits, travel documents or training certificates.</p> <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>
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. The Entity has implemented an ISO 45001 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	The Entity has determined in its Code of Conduct, 'Our policies convey that we will not tolerate discrimination of any kind in our global operations'. The Entity is working on 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,

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		<p>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 established an Equal Opportunities Committee which promotes and monitors equality.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has determined in its Code of Conduct, 'People come first. A diverse and inclusive culture where all people feel committed and offer the best of themselves. Nothing brings more value to the business than well-managed teams'.</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 defined in its Code of Conduct, 'We condemn all other forms of abusive behaviour, whether directed towards employees or those with whom we do business'. 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 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 has implemented an internal Human Rights risk assessment process based on the Danish Human Rights Institute which includes the risk of disciplinary practices.</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</p>

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		has established 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.
10.7b Remuneration (method of payment)	Conformance	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 established an employee-company joint committee that monitors compliance with the collective agreement.
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 established 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>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has identified fundamental daily safety practices in its Code of Conduct. The Entity has implemented an ISO 45001 management system that determines a Health and Safety Policy and ensures its communication to stakeholders, including employees, subcontractors, employees of temporary employment agencies and visitors. This policy includes commitment 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> <p>The HSE Policy is approved and reviewed annually by management. The Policy is available on the website: https://aludium.com/sostenibilidad</p>

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11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented a Health and Safety policy and ensures its communication to 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 a Health and Safety policy that includes commitment to comply with applicable legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented a Health and Safety policy which ensures its communication to stakeholders, including employees, subcontractors, employees of temporary employment agencies and visitors. This policy includes a commitment to an incident-free workplace, with each employee being responsible for their own well-being and that of their colleagues.
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.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented processes for the engagement of employees in Health and Safety issues. 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 agreement is monitored on quarterly by a Health and Safety Committee. The Entity also deploys different initiatives for the engagement of Workers, such as a health surveillance programme, suggestions programme and Safety Week.
11.4 OH&S performance	Conformance	The Entity has implemented processes for the continuous monitoring of the effectiveness of the system through indicators, objectives and action plans. The Entity demonstrates continuous improvement in the Health and Safety of its processes through action plans and the study of the best available techniques.

Document Control and Version History

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