

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Eccomelt a division of House of Metals Company Ltd.

CERTIFICATE NUMBER
377

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE SERVICES
UK LTD.**

DATE OF ISSUE
22 JULY 2024

DATE OF EXPIRY
21 JULY 2027

CERTIFIED SINCE
22 JULY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Conversion of Post-Consumer End
Of Life wheels into clean crushed
and shredded wheels as an alloy
substitute (Eccomelt356.2) at
Eccomelt located in Toronto,
Canada.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Eccomelt Canada
ENTITY NAME	Eccomelt a division of House of Metals Company Ltd.
CERTIFICATION SCOPE	Conversion of Post-Consumer End Of Life wheels into clean crushed and shredded wheels as an alloy substitute (Eccomelt356.2) at Eccomelt located in Toronto, Canada.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">1 – 3 May 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 May 2024
AUDIT SCOPE	<p>The Audit Scope covers the production and conversion of post-consumer End Of Life wheels into recycled scrap as an alloy substitute.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	22 July 2024 - 21 July 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 22 July 2025

CERTIFICATE NUMBER 377



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Eccomelt's Toronto, Canada Facility, (the 'Entity') which is a division of House of Metals Company Ltd, uses the Eccomelt process to convert post-consumer end-of-life automotive wheels into an 'eccomelt356.2' alloy without the use of melting, chemicals, or water. This alloy serves as a clean, economical, and sustainable substitute for A356.2/AlSi₇Mg0.3 ingots and T-bars, and provides the basis for Al-Si-Mg type foundry alloys, as well as serving as an economic Si master alloy for 6000 series billet Casthouses.

Eccomelt356.2 has one of the lowest carbon footprints among comparable Aluminium alloys and allows foundries and Casthouses to increase furnace efficiency while minimising the carbon footprint of their castings. Eccomelt products are used in high-quality castings such as wheels, chassis parts, and structural die castings of Al-Si type alloys, including safety-critical components like suspension parts and knuckles, brake components, and structural castings.

The Entity comprises two locations totalling six acres, each with a warehouse including single process lines, finished goods storage, and packaging areas. The nearest sensitive receptor is a residential area located within one kilometre of the Entity.

Eccomelt has been a market leader in Aluminium recycling since 2006, with locations in both the United States and Canada. Eccomelt produces a chemically pure, low-energy-intensive substitute for A356.2/AlSi₇, with one of the lowest carbon footprints in the industry. The primary destinations for products are Europe (50%), Mexico (30%), and the USA (20%).

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a management process for the identification and assessment of ASI-related legal requirements. The process includes a letter from a legally appointed counsel for the Entity regarding any conflicts between regulatory and statutory law. The compliance review is conducted quarterly. More information on the legal compliance assessment can be found in the Code of Conduct: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-001-Rev-1-Eccomelt-Code-of-Conduct-Policy-Signed.pdf
1.2 Anti-Corruption	Conformance	The Entity has established a Policy and procedures to manage the anti-Corruption but also ensures that every employee is part of this process: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-001-Rev-1-Eccomelt-Code-of-Conduct-Policy-Signed.pdf Training is provided to every employee during the hiring process and on an annual basis. After each training session, senior management, and employees sign anti-Corruption agreements, reinforcing their collective commitment. All employees are encouraged and required to report any instances of Corruption, and a relevant email is sent to employees and suppliers annually, outlining how to report and what to report.
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, addressing environmental, social, and governance principles and the commitment to respect Local Communities' rights. The Code of Conduct has been communicated with employees through training and each employee has signed off on this training (last held on April 2024). The Code of Conduct and the reporting mechanism are available for all interested Stakeholders: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-001-Rev-1-Eccomelt-Code-of-Conduct-Policy-Signed.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed and implemented systems, procedures, and processes that conform to the requirements of environmental, social, and governance Policies. The policies have been approved by the Entity's senior management. Senior management demonstrates their commitment to the Policies through the provision of resources, and regularly reviews the Policies in the management review meeting. The Entity holds an ISO 9001:2015 Quality Management Systems Certificate with plans to achieve ISO 14001:2015 Environmental Management Systems status by 2025. For more information refer to the Entity's Sustainability Report: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf
2.2a-c Leadership	Conformance	The Entity has designated a Senior Management Representative to communicate and implement the ASI Policies and has established resources to maintain their ASI Performance Standard certification. Other employees are responsible for maintaining the requirements of the Performance Standard, addressing environmental, social, and governance requirements.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established a documented policy and process for an Environmental Management System. The Entity holds an ISO 9001:2015 Quality Management Systems Certificate with plans to achieve ISO 14001:2015 Environmental Management Systems status by 2025.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established, implemented, and maintained a social Management System. The management procedures define the management requirements related to social responsibility, such as Human Rights, labour, community relations, and risk assessment. The Entity has identified and assessed social management risks and impacts and concluded that there is a low risk of social and environmental impacts. The Entity holds an ISO 9001:2015 Quality Management Systems Certificate with plans to achieve ISO 14001:2015 Environmental Management Systems status by 2025.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures, and processes for responsible procurement. The Entity has identified its key suppliers and created a supplier evaluation checklist. All suppliers must sign off on an initial contract, or the Supplier Sustainability Policy and the Code of Conduct. The Responsible Sourcing Policy is defined in the 2024 Sustainability Report and the Supplier Sustainability Policy is publicly disclosed at: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-004-Rev-0-Eccomelt-Supplier-Sustainability-Policy.pdf However, the 'Eccomelt Supplier Sustainability Policy' does not include information on the updating and/or reviewing of the Policy.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes. However, the Entity has established and implemented procedures to identify and assess risks in social and environmental aspects.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes. However, the Entity has established and implemented the documented procedures to identify and assess the risks to Human Rights and business ethics with relevant control measures to screen developments, expansions, and significant changes to operating Facilities and, in the case of New Projects or significant changes, to determine if social risks and impacts require an Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan that incorporates potential emergencies, such as fires, extreme weather, health epidemics, and critical equipment breakdown. The Emergency Plan is available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity has developed a contingency plan and procedures to address situations where it may have to suspend or significantly alter operations due to factors outside its control. The suspension process and management procedure will be reviewed annually in case of Material, environmental, social, and governance risks resulting from business changes, or any indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a process for Mergers and Acquisitions; the executive team has committed to conducting Due Diligence processes for mergers and acquisitions in the future and reviewing its

CRITERION	RATING	COMMENT
		environmental, social, and governance. The Entity has had no such activity in the last ten years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a process for Closure, Decommissioning, and Divestment. The Entity's executive team has committed to conducting Due Diligence processes for closure, Decommissioning, and Divestment in the future and reviewing its environmental, social, and governance practices. The Entity has had no such activity in the previous ten years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has created a procedure for information disclosure. The 2024 Sustainability Report has been published on the Entity's website. The key performance indicators reported include environment, governance, and social. The 2024 Sustainability Report is publicly disclosed at: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity's Sustainability Report 2024 includes legal compliance and other related information. The report's content related to legal compliances and liabilities was verified on relevant government websites during the Audit. No fines or other kinds of penalties were identified.</p> <p>The official websites of the relevant government agencies do not list any significant fines, judgments, penalties, or non-monetary sanctions for failure raised by the relevant government agencies.</p> <p>https://www.ontario.ca/page/government-ontario https://www.appmybizaccount.gov.on.ca/onbis/master/viewinstance/view.pub?id=3abd3bce3cc0ad2a44c1b525114fa5e3871c83678c292820&_timestamp=4600485623557584</p>
3.3a-c Payments to Governments	Conformance	The Entity's Sustainability Report 2024 discloses that it only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established an email address and Human Resource hotline to receive complaints/grievances/inquiries; the complaint resolution process is defined in the Complaint Resolution Procedure and is also available on the Entity's website at: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-006-Rev-0-Complaints-Resolution-Procedure.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity identifies and quantifies the inputs (raw material and energy), production process, outputs (product, waste emission, and discharges, including air, Greenhouse Gases (GHG), water, and solid wastes) for the purposes of Life Cycle Assessment (LCA). The Entity has established that processes have a low impact on major product lines. The Life Cycle Assessment (LCA) report has been prepared by a consultancy, but was not finalised at the time of the audit.

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The Entity identifies and quantifies the input (raw material and energy), production process, and output (product, waste emission, and discharge, including air, GHG, water, and solid wastes) in the LCA.</p> <p>The Life Cycle Assessment (LCA) report has been prepared by a consultancy but was not finalised at the time of the audit. However, the LCA will be made available to stakeholders on request once it is finalised.</p>
4.2 Product Design	Not Applicable	This criterion is not applicable, the Entity procures end-of-life Aluminium wheels that are shredded, cleaned, and packaged into bags as finished goods. The process does not involve any design or fabrication.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity operates in a 'closed loop' system and purchases End of Life wheels, processes and converts the metal into the finished product. The business model involves the material conversion from Scrap Aluminium only. Any waste metal generated during the process is separated and sold as a secondary product for further recycling. More information on the Entity's process Scrap is available at: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity implemented a recycling strategy through House of Metals Company, Eccomelt's parent company has been in the business of recycling scrap Aluminium since 1953. The Entity has developed an environmentally friendly, economical alternative to primary, which is produced through the recycling of Aluminium wheels. More information on the Recycling Strategy is available in the Sustainability Report, pages 9-11: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity purchases post-consumer wheels from Scrap metal and automotive recyclers in business-to-business transactions. The Entity does not purchase or collect wheels through public channels through local, regional, and national collection systems. Wheels are delivered to their site by our suppliers through purchase orders.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity's Greenhouse Gas (GHG) Emissions and Energy Use by Source are tracked, calculated, and documented based on the initial independent verification report from Climate Partner. Energy consumption is monitored and documented as one of the main GHG emission sources. Other primary emission sources are identified and documented. The energy consumption and other primary GHG sources are converted into GHG emissions using the GHG protocol defined by the Entity.</p> <p>The GHG emission reports were prepared by Climate Partner. The Entity publicly discloses the verified information of energy use and GHG emissions by source in the Sustainability Report: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Started production after 2020		
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has reported that GHG emissions are below the recommended threshold, however, commits to annual monitoring and reporting of the GHG Emissions Reduction Plan in the Sustainability Report: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p> <p>The Entity is committed to monitoring its GHG emissions in order to minimise the environmental impact of all its Business Activities. They are committed to achieving as close to net-zero emissions as possible and will continue to take appropriate measures to achieve this goal.</p> <p>The 2023 GHG emissions for all sites averaged 0.081 t/CO₂e per t/Al. Plans to maintain and further reduce these emissions in 2023 include the reduction of diesel, propane and electricity. The Entity expects to reduce these consumables through active monitoring of consumption, equipment changes, carbon offsets and continuous monitoring of demand.</p> <p>However, there is still insufficient detail included in the reduction plans, as there is no clear GHG Emissions Reduction Pathway nor an interim target (of up to five years).</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity 2023 GHG emissions for all Facilities averaged 0.081 t/CO₂e per t/Al. The plans to maintain and further lower these emissions include the reduction of diesel, propane and electricity. The Entity anticipates reducing these consumables through active monitoring of usage, changes in equipment, carbon offsets, and continuous demand monitoring.</p> <p>The Entity publicly discloses the verified information of energy use and GHG emissions by source in the Sustainability Report, pages 13-14: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity demonstrates that their main product eccomelt356.2, is produced by a patented process that has the lowest carbon footprint of any A356 Aluminium alloy. Emissions to the atmosphere from this process are minimal and limited to dry residual powder. The Entity's plant operates within the requirements of its applicable licences for atmospheric emissions. Key process equipment such as crushers and blasters are equipped with dust collection systems to capture any dust generated during production.</p> <p>However, the Entity could not provide reports to demonstrate that emissions are controlled and quantified. Additionally, the Entity has not publicly disclosed significant air emissions from its operations.</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	<p>The Entity has no processes where discharge to water will impact the environment. The shredded wheels are subject to steel shot blasting, the process generates dust captured through high-efficiency dust collectors and no water is used in this process.</p> <p>Water is discharged directly into municipal sewage systems. Relevant information is publicly disclosed in the 2024 Sustainability Report at: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has created a new 'Eccomelt Industrial Spill Response Plan' that came into effect in January 2024. The response team conducts an annual risk assessment which, identifies potential risk areas for Spills. The Plan is made available to relevant authorities.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented a new Spill Response Plan which came into effect in January 2024. The response team conducted a risk assessment internally, identifying potential areas for Spills. No significant Spills or Leakages occurred within the fiscal year 2022-23: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity generates Non-Hazardous Waste which is disposed of by a third-party waste management company. Any waste generated is primarily from received or packaging waste generated during shipment. Information relating to waste Management and reporting is disclosed within the 2024 sustainability report at: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's plant operations do not use industrial water, and water usage is limited to office and general sanitary consumption. The water assessment and disclosures are included in the 2024 Sustainability Report, page 16: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf</p> <p>Any water discharges are discharged directly to municipal sewage systems, with no discharge to the ground, minimising the risk of contamination of Watersheds.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material water-related risks were identified in the risk assessment.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>The Entity has operations in Toronto and has been operating in an area that has been a designated site for industrial purposes for many decades. The impact of operations on Biodiversity from Emissions To Air, water and waste has been reviewed and considered while obtaining legal operating permits.</p> <p>However, the Entity did not present an assessment of risks and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within the Entity's Area of Influence even if they are considered to have a low impact on Biodiversity and Ecosystem Services.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	As the Entity has not yet completed an assessment of risks and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within the Entity's Area of Influence, it cannot accurately determine the presence (or absence) of, and potential impacts on, priority biodiversity features and/or Priority Ecosystem Services.
8.2a-g Biodiversity Management	Minor Non-Conformance	The Entity has not yet completed an assessment of the risks and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within the Entity's Area of Influence.
8.3a-c Management of Priority Ecosystem Services	Minor Non-Conformance	The Entity has not yet completed an assessment of the risks and potential impacts on Biodiversity and Ecosystem Services from the land use and activities within the Entity's Area of Influence.
8.4 Alien Species	Conformance	The Entity's operations involve the sourcing of raw materials (wheels) from local or regional dealers who have operating permits based on national and local laws and regulations. Therefore, the risk of the deliberate introduction of unwarranted species that may disrupt the local environment and habitat is considered minimal.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	<p>This Criterion is not applicable, as the Entity has confirmed it is not in proximity to any World Heritage Properties. This information can be verified at:</p> <p>https://whc.unesco.org/en/list/?search=toronto+canada&component_s=0&order=country</p>
8.6a-d Protected Areas	Not Applicable	The Entity operates within the metropolitan area of the city of Toronto, in a permitted industrial zone. There are no Protected Areas identified by the City of Toronto in the Industrial Zone. The City of Toronto designates Protected Areas such as natural parks or conservation areas and does not permit industrial operations in those areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity commits to respecting Human Rights. And has developed an associated training course which is provided to all employees. A process has been established to identify and assess the risks and impacts on Human Rights, including the risks and impacts existing in the supply chain, taking the existing control measures and practices. The requirements of the ASI Performance Standard are communicated to suppliers, the major supplies are identified, and compliance audits are conducted. More information is available in the Human Rights and Anti-Harassment Policy: https://ecomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-008-Rev-0-Human-Rights-and-Anti-Harrassment-Policy.pdf
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has provided a detailed gender audit report of the current employment status and effective gender equality. However, the Entity has not implemented a program that promotes gender equity and women's empowerment and has not disclosed the effectiveness of the measures taken to promote gender equity on an annual basis.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates. The Entity respects the rights and interests of Indigenous Peoples and follows Applicable Law relating to Indigenous Peoples, and alignment with the ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes. The Entity has confirmed that Due Diligence will be conducted for New Projects to assess all risks, including those related to Human Rights and Free, Prior, and Informed Consent (FPIC).
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes. The Entity has confirmed that Due Diligence will be conducted for New Projects to assess all risks, including those related to Human Rights and Free, Prior, and Informed Consent (FPIC).
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as there are no sites of cultural value and/or sacred heritage within the Entity's Area of Influence. The City of Toronto designates what type of businesses are allowed to operate within cultural and sacred heritage lands.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present where the Entity operates.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes that will lead to physical and/or economic displacement.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Not Applicable	This Criterion is not applicable to the Entity, as they are located in an industrial zone with negligible negative impacts on Local Communities lands, livelihoods, and use of natural resources.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity, they only source Post-Consumer Scrap from local or regional suppliers.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity, they only source Post-Consumer Scrap from local or regional suppliers.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, they only source Post-Consumer Scrap from local or regional suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity, they only source Post-Consumer Scrap from local or regional suppliers.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable to the Entity, they only source Post-Consumer Scrap from local or regional suppliers.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity as it does not utilise any security practices or services.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity complies with the regulations of the Ministry of Labour regarding employees' rights to Freedom Of Association and Collective Bargaining, as communicated in the internal employee handbook.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Applicable Law in Canada does not limit the right to Freedom Of Association and Collective Bargaining
10.2a Child Labour	Conformance	The minimum age must be 18 years to undertake production work at the Entity. The Entity verifies the ages of employees from Government-issued identification cards, and work permits according to labour laws.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity states and verifies that it does not employ Forced Labour in its manufacturing Facilities. The Entity's policy manuals describe their commitment to practising fair employment policies. The Entity does not employ Forced Labour in its manufacturing Facilities.</p> <p>The Entity has established a Forced Labor Policy; however, it does not meet the minimum requirements and content for a Modern Slavery Statement.</p> <p>https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-007-Rev-0-Eccomelt-Forced-Labor-Policy.pdf</p>

CRITERION	RATING	COMMENT
10.4a-c Non-Discrimination	Conformance	The Entity has created policies and procedures that state the Entity's commitment and approach to Non-Discrimination. This information can be found in the 2024 Sustainability Report and employee handbook. The statement is publicly disclosed in the Sustainability Report: https://eccomelt.com/wp-content/uploads/2024/05/2024-Eccomelt-Sustainability-Report.pdf
10.5 Communication and engagement	Conformance	The Entity engages in multiple methods of communication with all employees including email announcements and employee meetings to communicate company information to all operating Workers in daily shift meetings. Important information is posted on bulletin boards and employee Policy Handbooks. Meeting minutes and bulletin board documents are also available on request.
10.6a-g Violence and Harassment	Conformance	The Entity complies with local and federal regulations relating to the fair treatment of Workers and it does not engage in any means or methods that involve Violence or Harassment. The Entity has established disciplinary policies covered in the employee handbook and communicated to employees when hiring, and are posted on notice boards. Human Rights and Anti-Harassment Policy: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-008-Rev-0-Human-Rights-and-Anti-Harrasment-Policy.pdf Workplace Anti-Violence Policy: https://eccomelt.com/wp-content/uploads/2024/05/ECC-POL-COR-009-Rev-0-Workplace-Anti-Violence-Policy.pdf
10.7a-c Remuneration	Conformance	The Entity provides fair and equitable wages and benefits based on industry practices that comply with local regulations. Employees are paid directly through electronic deposits into bank accounts. Wages are paid fortnightly based on 44 hours per week of full-time employment and Overtime is paid at a rate of 1.5 times the base rate for hours greater than 44 hours per week. Further verification of this was conducted at the Ministry of Labor site: www.employerline.ca/employer-advice-ontario/minimum-wage Ontario Minimum Wage: https://www.ontario.ca/document/your-guide-employment-standards-act-0/minimum-wage Ontario Overtime Pay: https://www.ontario.ca/document/your-guide-employment-standards-act-0/overtime-pay
10.8a-c Working Time	Conformance	The Entity complies with Ontario's Working Hours requirements. The Employment Standards Act (ESA) specifies the number of working hours an employer can legally require an employee to work as follows: 8 hours in a day and 48 hours in a work week. Any exceptions to these working hours, such as Overtime, must be outlined in an employee contract, in which the employee agrees to a specified number of hours per day or work week.
10.9a-b Informing Workers of Rights	Conformance	The Entity has a combined policy manual that states the company's commitment to Workers' Rights and Workers receive a copy of the Eccomelt Employee Handbook

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a Health and Safety Policy Manual and conducts individual plant safety audits on a monthly basis. Findings are reviewed in scheduled safety management review meetings. The Entity has established a basic Environment, Health and Safety (EHS) Management System program that includes the workforce.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has developed and implemented a Health and Safety Policy Manual and conducts individual plant safety audits on a monthly basis. Findings are reviewed in scheduled safety management review meetings. The Entity has established a basic EHS Management System program that includes all Workers.</p> <p>The Entity has provided the Workplace Safety Insurance Board (WSIB) report for Toronto, which lists workplace injuries, lost time injury rates and insurance premiums. However, this information on the effectiveness of their OH&S Management System, including leading and lagging indicators, and comparative performance analysis with peer companies and leading practices, is not publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a Health and Safety Policy Manual and conducts individual plant safety audits on a monthly basis. Findings are reviewed in scheduled safety management review meetings. The Entity has established a basic EHS Management System program that includes all Workers.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 July 2024	Initial Certification Audit – Full Certification