
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HAMMERER ALUMINIUM INDUSTRIES GmbH

CERTIFICATE
NUMBER

76

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

24 FEBRUARY 2020

DATE OF EXPIRY

23 FEBRUARY 2023

CERTIFIED SINCE

24 FEBRUARY 2020

AUTHORISED BY

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

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

The production of extrusion billets and rolling
ingots from recycled aluminium scrap.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries Holding GmbH
ENTITY NAME	Hammerer Aluminium Industries GmbH
CERTIFICATION SCOPE	The production of extrusion billets and rolling ingots from recycled aluminium scrap.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/Refining, Casthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">3 December 2019 . 4 December 2019 (First Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 February 2020 (First Certification Audit)
AUDIT SCOPE	<p>The production of extrusion billets and rolling ingots from recycled aluminium scrap.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining, Casthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- 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

24 February 2020 - 23 February 2023

NEXT AUDIT
TYPE

Surveillance audit

NEXT AUDIT
DUE DATE

23 August 2021

CERTIFICATE
NUMBER

76

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. There are systems in place (e.g. a legal database) to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001 and OHSAS 18001 certifications from an accredited certification body. HAI group supports the site with legal counsel.
1.2 Anti-Corruption	Conformance	The entity works against corruption in all its forms, consistent with applicable law and prevailing international standards. Among the instruments, there is a code of conduct issued and communicated internally and externally. The entity has provided training to employees with regards to business ethics. HAI group operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor. Please find below a link to HAI's anti-bribery and corruption policy: https://www.hai-aluminium.com/en/wp-content/uploads/2018/10/code-of-conduct_en_v1_20181017.pdf (English) https://www.hai-aluminium.com/wp-content/uploads/2018/10/code-of-conduct_de_v1_20181017.pdf (German)
1.3 Code of Conduct	Conformance	The entity has implemented a code of conduct including principles relevant to environmental, social and governance performance. HAI's code of conduct can be accessed via the link below: https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf (German). Their supplier code of conduct is available via this link: https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf (English).

CRITERION	RATING	COMMENT
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The entity has implemented and maintains policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The policies are subject of periodic employee training. The site holds certificates according ISO 14001 and OHSAS 18001 from an accredited certification body which is current for the entity's certification scope.</p> <p>Labour and Ethics are addressed in the HAI Group's Codes of Conduct for employees and suppliers.</p> <p>More information can be found via the links below:</p> <p>https://www.hai-aluminium.com/en/wp-content/uploads/2016/11/ISO-14001-EN.pdf (ISO 14001 certificate, English),</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2016/11/ISO-14001-DE.pdf (ISO 14001 certificate, German);</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2016/11/OHSAS_18001_HAI_GmbH_DE-1.pdf (OHSAS 18001 certificate, German);</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2018/08/UMWELT_GESUNDHEIT_SICHERHEITSMANAGEMENT_POLITIK_HAI_GMBH_2018_DE_.pdf (EHS Policy statement, German);</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf (Code of conduct for employees, German),</p> <p>https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf (Code of conduct for suppliers, English).</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>In accordance with the ASI Performance Standard as well as their Environmental and Health & Safety Management System, the auditee has senior management endorsement and support through provision of resources and regularly review of the policies. The entity obtained ISO 14001 and OHSAS 18001 certifications which are consistent with their ASI Performance Standard certification scope.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The auditee has communicated the policies internally and externally as appropriate</p>

CRITERION	RATING	COMMENT
		<p>(company website, intranet). Their supplier code of conduct is actively communicated to their suppliers. Interviews with workers and management confirmed that the communication is effective.</p> <p>Via the following link the quality policy, environment, health & safety policy and the codes of conduct for employees and for suppliers can be accessed: https://www.hai-aluminium.com/downloads/</p>
2.2 Leadership	Conformance	<p>The entity's COO (technical managing director) has the overall responsibility and authority for ensuring conformance with this Standard and to ensure sufficient resources to support the implementation of the Standard. The COO is supported by the local team as well as by the staff from HAI group. Responsibilities are reflected in the organization charts.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The auditee has documented and implemented an environmental management system according to ISO 14001:2015. These systems are certified by an accredited certification body.</p> <p>Please see the following link: https://www.hai-aluminium.com/en/wp-content/uploads/2016/11/ISO-14001-EN.pdf (English version).</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The auditee has documented and implemented an accredited H&S management system (OHSAS 18001). The facets human & labour rights are also managed, but the practice is not yet formalized to the same extent as the EHS system.</p>
2.4 Responsible Sourcing	Conformance	<p>The entity has issued its sourcing policy in a "code of conduct for suppliers", please find the link below: https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf</p> <p>The entity's sourcing process is documented and it is in accordance with the requirements of the ASI Performance Standard. Regular due diligence and supplier evaluation takes place.</p>
2.5 Impact Assessments	Conformance	<p>Bigger projects or major changes to existing facilities did not take place since the entity</p>

CRITERION	RATING	COMMENT
		<p>joined ASI.</p> <p>The site is located in a highly regulated country (Austria), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorization process and the entity has systems in place to manage this effectively.</p>
2.6 Emergency Response Plan	Conformance	<p>The entity has a site specific emergency response plan developed, in collaboration with relevant stakeholders such as the industrial neighbour and relevant authorities. The auditee also holds ISO 14001 and OHSAS 18001 certifications which are current to the entity's certification scope under ASI Performance Standard.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The auditee did not undergo or plan a merger or acquisition (M&A) since the entity joined ASI. However, a process has been defined to manage M&As, should it become relevant.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>A procedure for Closure, Decommissioning and Divestment is established in accordance to the requirement of ASI Performance Standard, but no such case has happened since 2010.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The entity has disclosed its governance approach and its material environmental, social and economic impacts by issuing its sustainability report 2018, based on GRI G4 Guidelines. This report covers the entity Hammerer Aluminium Industries Extrusion GmbH and also Hammerer Aluminium Industries Holding GmbH. It is available via the following link: https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>Information about significant fines, judgments, penalties and non-monetary sanctions is included in the sustainability report 2018, see https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf</p> <p>As witnessed by the entity's management, there were no significant fines, judgments, penalties and non-monetary sanctions enforced in 2018 and 2019 YTD.</p>

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The auditee has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to governments and facilitation of payments (Via the following link the codes of conduct for employees and for suppliers can be accessed: https://www.hai-aluminium.com/downloads/). As witnessed by the entity's management and confirmed by the report of the financial audit 2018, the entity did not make government payments other than taxes, fees and social insurance. All payments are subject to annual external financial audit.
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 established accessible complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. A dedicated E-Mail address has been established (ethics@hai-aluminium.com), accessible for all stakeholders. Employees can also direct their concerns to the worker representatives. Due to the size and nature of the business, stakeholders can also easily reach top management directly.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The entity has evaluated its life cycle impacts of its products and published the data in their sustainability report 2018 (accessible from the HAI website (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf)). However, the data is aggregated for two legal entities, one of them is not yet within the scope of the certification according the ASI Performance Standard. Also, the methodology of the life cycle assessment is not specified.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Not Applicable	For the time being, this criterion is not yet applicable, because as witnessed by the entity's management, there are no customer requests for a cradle-to-gate life cycle assessment on its products yet.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The entity has evaluated its life cycle impacts of its products and published the data in their sustainability report 2018 (accessible from the HAI website (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf)).</p> <p>However, the methodology of the life cycle assessment is not specified and underlying assumptions including system boundaries are not clearly described.</p>
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The entity has systems and a robust program in place to recycle 100% of its aluminium process scrap, either within its own operations, within the HAI group or at external partners. They achieve an almost 100% recycling-rate of scrap.</p> <p>The entity's waste balance is reported in their sustainability report 2018 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf).</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The entity has developed and implemented processes that allow for the separation of different grades of aluminium. The effectiveness of these processes have been observed during the site tour.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a recycler of aluminium, the entity has the clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a monthly basis.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The entity has disclosed its greenhouse gas emissions and energy use by source in its sustainability report 2018, which can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf

CRITERION	RATING	COMMENT
		<p>content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf.</p> <p>However, emissions originating from the combustion of Diesel fuel have not been considered. Also, the data has been aggregated for both Austrian legal entities of the HAI group in Ranshofen, only one of them is covered by the certification according the ASI Performance Standard.</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>The entity has published GHG emissions reduction targets (page 24 of Hammerer's sustainability report 2018 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf)) and implemented a plan to achieve these targets.</p> <p>The targets cover direct GHG emissions but not yet the indirect ones, due to the nature of the business.</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>Air emission data is collected and reported in the annual Sustainability Report 2018.</p> <p>A copy of the annual report is available on the HAI website: https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf</p>
6.2 Discharges to Water	Conformance	<p>HAI GmbH does not directly discharge effluents into waters (creeks or rivers). Instead, effluents are treated in the neighbour's industrial waste water treatment plant.</p> <p>The entity has disclosed its discharges to water in its sustainability report 2018, which can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf</p>

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>Within the scope of its certified environmental management system according to ISO 14001, the entity periodically identifies and evaluates major risk areas of operations where spills and leakage may contaminate air, water or soil.</p> <p>The certificate can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2016/11/ISO-14001-DE.pdf</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>As part of its environmental management system, the entity has established management and external communication plans, compliance controls and a monitoring programme in place to prevent and detect spills and leakage.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The entity has procedures in place to ensure disclosure to affected parties the volume, type and potential impact of significant spills immediately after an incident. As reported in the sustainability report 2018 on page 27 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf), there was no significant release of substances in the 2018 reporting year.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>As reported in the sustainability report 2018 on page 27 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf), there was no significant release of substances in the 2018 reporting year.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>In line with its environmental management system according ISO 14001, the entity has implemented a waste management strategy. The various types of waste (such as hazardous waste, recyclable waste, aluminium and dross) are segregated and exposed of or treated in accordance with local law.</p> <p>However, the entity's current waste management concept does not contain defined waste related targets.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The entity has publicly disclosed the quantity of their generated waste in the sustainability report 2018, page 25 (https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf).</p>

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (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 entity works continuously to maximise the recovery of aluminium by treatment of dross and dross residues. Key factors are trained workers, technical parameters of the furnace and the remelting process. 100% of the dross is being treated (dross is either sent to the neighbour facility or the entity's own subsidiary in Romania for recovery of the aluminium content (salt process)).
6.8b Dross (recycling)	Conformance	The entity works continuously to maximise the recovery of aluminium by treatment of dross and dross residues. Key factors are trained workers, technical parameters of the furnace and the remelting process. 100% of the dross is being treated. Locally recovered aluminium is fed back into the casting process.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Not Applicable	This criterion doesn't apply to the entity, as the entity does not dispose dross residues in landfill. Dross residues are recycled by a specialized refining company.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The entity has a system in place to identify and map its water withdrawal and use by source and type. Water is supplied by and discharged to the industrial neighbour company.
7.1b Water assessment (risk assessment)	Conformance	The entity is fully supplied by its industrial neighbour, who is also certified according ASI Performance Standard. That's why water-related risks in watersheds are assessed by them and not by the entity.
7.2a Water management (management plans)	Not Applicable	The entity did not develop its own water management plan, as water is supplied by its large industrial neighbour, who holds his own certification according ASI Performance Standard.
7.2b Water management (monitoring)	Not Applicable	The entity did not develop its own water management plan, as water is supplied by its large industrial neighbour, who holds his own certification according ASI Performance Standard.
7.3 Disclosure of water usage and risks	Conformance	The entity has publicly disclosed its water consumption in the Sustainability Report 2018, see https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The entity has systematically assessed the risks and materiality of the impacts on biodiversity from the land use and activities in the entity's area of influence. A documented biodiversity assessment report is available.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the biodiversity assessment, the entity has implemented a biodiversity action plan. Its implementation is monitored periodically.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The biodiversity action plan (BAP) was established with consultation of stakeholders (local community and industrial neighbours engaged during the BAP development).

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Minor Non-Conformance	The entity has established a biodiversity action plan only recently, a reporting mechanism is not yet in place.
8.3 Alien Species	Conformance	During the entity's thermal processing of the aluminium scrap, all species are destroyed. Relevant remaining risk are the wooden pallets, which are all are treated according the international standards for phytosanitary measures No. 15 (ISPM-15).
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 issued its codes of conduct for employees and suppliers, expressing a commitment to respect human rights.</p> <p>The codes can be accessed via the following links: https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf https://www.hai-aluminium.com/wp-content/uploads/2016/11/CoC-Lieferanten-EN.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	HAI group has conducted a documented human rights diligence assessment but consultation of external stakeholders was not systematic. However, the site is deeply imbedded in the community and society and as witnessed by interviewed stakeholders and management, there are currently no salient issues with regard to human rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The group's human rights assessments has confirmed that there are no salient adverse human rights impacts present at the audited

CRITERION	RATING	COMMENT
		site. Indigenous people are not present in the region.
9.2 Women's Rights	Conformance	The auditee has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. During the site tour, interviews and document review, no indication for deliberate discrimination of women was observed. The HAI group is reporting publicly on gender diversity indicators such as the number of female/male workers and male/female apprentices (see HAI sustainability report 2018: https://www.hai-aluminium.com/wp-content/uploads/2019/11/Sustainability_Report_HAI_2018_FINAL.pdf)
9.3 Indigenous Peoples	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.5 Cultural and sacred heritage	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.7a Local Communities (rights and interests)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the entity, as the outcome of the human rights due diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.7b Local Communities (impacts)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the entity, as the outcome of the human rights due diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the entity, as the outcome of the human rights due diligence conducted has confirmed that there are no issues with local communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The site is not located in or near a Conflict Affected or High Risk Area (CAHRA). Regarding

CRITERION	RATING	COMMENT
		<p>supply chain, see criterion 2.4</p> <p>The entity follows the definition of CAHRAs from the "Armed Conflict Location Event Data Project" (www.acleddata.com) and Peace Direct (www.peacedirect.org). According to list of suppliers, no supply from a CAHRA.</p> <p>All new suppliers undergo a due diligence process. During the assessment, there were no indications observed that the entity would contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p>
9.9 Security practice	Conformance	<p>The site does not employ armed security forces. During the entity's human rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known human rights violations caused by the security service. Security is operated by the neighbour company, which is also certified according ASI Performance Standard.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The entity respects the rights of workers to unite freely in the unions, seek representation and join the works council without interference. A freely elected worker representation is in place.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The entity respects the rights of workers to collective bargaining, participates in any collective bargaining process in good faith to the extent possible under applicable law and adhere to collective bargaining agreements where and as far as such agreements exist. The entity is a member of the employers industry association and they have negotiated collective bargaining agreements with the union. Additionally site specific agreements have been negotiated with the workers representation (works council).</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	<p>This criterion of the ASI Performance Standard is not applicable to the entity, as the right to freedom of association and collective bargaining is not restricted in the country where the entity operates/is located/seated.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The entity does neither use nor support the use of child labour. Minimum working age of 15 years is respected. The youngest worker</p>

CRITERION	RATING	COMMENT
		(apprentice) was 15 years old. There are robust practices in place to ensure then children are not employed.
10.2b Child Labour (hazardous)	Conformance	The entity does neither use nor support the use of child labour. Minimum working age of 15 years is respected. The youngest worker (apprentice) was 15 years old. There are robust practices in place to ensure then children are not employed.
10.2c Child Labour (worst forms)	Conformance	The entity does neither use nor support the use of child labour. Minimum working age of 15 years is respected. The youngest worker (apprentice) was 15 years old. There are robust practices in place to ensure then children are not employed.
10.3a Forced Labour (human trafficking)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the entity's human rights due diligence assessment.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not require workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not hold workers in debt bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not unreasonably restrict the freedom of movement of workers in the workplace, as confirmed by

CRITERION	RATING	COMMENT
		interviews and document review. The entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not retain original copies of workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review. Applicants must present an ID, but only a copy will be filed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The auditee does neither engage in nor support the use of forced labour. The entity does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	The entity is committed to non-discrimination and communicates this commitment in its code of conduct. As confirmed by interviews and document review, the auditee does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to discrimination. Employees receive diversity and anti-discrimination training.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the auditee does ensure open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers.
10.7a Remuneration (living wage)	Conformance	The entity does respect the rights of workers to a living wage and ensures that wages paid for a

CRITERION	RATING	COMMENT
		<p>normal working week meet the industry standard, as confirmed by document review and worker interviews.</p> <p>Working time, payment and leave are negotiated in collective bargaining agreements. The wages paid are substantially above the legal minimum. They are in line with the national industry standard.</p>
10.7b Remuneration (method of payment)	Conformance	As has been verified by document review and interviews during the assessment, the entity's wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employee's bank accounts.
10.8 Working Time	Conformance	<p>The auditee does comply with applicable law and industry standards on working time, public holidays and paid annual leave.</p> <p>Working time is part of the collective bargaining agreements and part of each employment contract. Clocking-in system is in place. Records are on hand.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated its OHS policy as required by the ASI Performance Standard. The certificate can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2016/11/OHSAS_18001_HAI_GmbH_DE-1.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The entity has implemented and communicated (postings, intranet, internet) it's OHS policy as required by the ASI Performance Standard. The policy is subject to employee training.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The entity has included in its policy statement related to occupational health & safety or in their codes of conduct respectively, a commitment to comply with applicable law on workers health and safety, international standards, and ILO Conventions on occupational health and safety.</p>

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non-Conformance	In its policy related to occupational health & safety, the entity has not included the workers right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. However, such right is contained in the entity's "environment, health & safety manual".
11.2 OH&S Management System	Conformance	The Entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated its OHS policy as required by the ASI Performance Standard.
11.3 Employee engagement on health and safety	Minor Non-Conformance	The entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The entity has implemented a joint health and safety committee, by which workers can raise, discuss and participate in the resolution of occupational health and safety issues with management. Agendas and meeting minutes are on hand. However, the process of involving workers in H&S related matters is not fully effective, as formal meetings of the H&S committee take place only once per year.
11.4 OH&S performance	Conformance	The entity evaluates its occupational health & safety (OH&S) performance regularly and several key performance indicators are related to OH&S. The entity has several tools for evaluating performance and continuously improves its OH&S management system.

Document Control and Version History

Revision	Date	Notes
0	24 February 2020	Issued (Full Certification)