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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# ALERIS

CERTIFICATE  
NUMBER

31

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

31 JULY 2019

DATE OF EXPIRY

30 JULY 2022

CERTIFIED SINCE

31 JULY 2019

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

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CERTIFICATION SCOPE

Aleris for the Aluminum Duffel facility (Belgium).

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

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### OVERVIEW

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MEMBER NAME           Aleris

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ENTITY NAME           Aleris Aluminum Duffel BVBA

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CERTIFICATION SCOPE           Aleris for the Aluminum Duffel facility (Belgium).

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SUPPLY CHAIN ACTIVITIES           

- Casthouse
- Aluminium Re-melting/Refining
- Semi-fabrication

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ASI STANDARD           

- Performance Standard V2

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AUDIT TYPE           

- Certification Audit

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AUDIT FIRM           Bureau Veritas Certification

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AUDIT DATE           24 – 25 April 2019

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AUDIT REPORT SUBMISSION           17 May 2019

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AUDIT SCOPE           The production plant Aleris Duffel Belgium is a mill that provides automotive body sheet and General coil and sheet products.

Supply chain activities included in the audit scope:

- Casthouse
- Aluminium Re-melting/Refining
- Semi-fabrication.

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

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AUDIT OUTCOME           

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION  
PERIOD

31 July 2019 – 30 July 2022

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NEXT AUDIT  
TYPE

Recertification Audit

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NEXT AUDIT  
DUE DATE

30 July 2022

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CERTIFICATE  
NUMBER

31

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Governance is a shared responsibility between the site and central functions of the group. Aleris Aluminum Duffel BVBA has a legal department; annual audits are conducted. A complete economic and financial information report is available on the website of the national bank of Belgium.
1.2 Anti-Corruption	Conformance	The Entity has a detailed Codes of Conduct that contain business practices and procedures relating to corruption, bribery etc. All white-collar workers have to participate in and pass regular e-learnings. A global compliance hotline exists.
1.3 Code of Conduct	Conformance	The Entity has an internal and an external Code of Conduct and refers to it on its website and in its sustainability reports. An external hotline for compliance ( <a href="http://www.MySafeWorkplace.com">www.MySafeWorkplace.com</a> ) is communicated.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an integrated management system for environmental, social and governance compliance. Several policies exist and are translated in various languages (Code of Conduct", "Health, Safety, Security and Environment Policy" etc.), the implementation is monitored through the internal auditing system.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Strong commitment of management to the implementation of the management systems. External audits and evaluations take place to verify the effective implementation of the systems, both by certification bodies and public authorities.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are communicated externally on the website and internally at the plant. Main achievements are communicated in the publicly available sustainability report (see <a href="https://www.aleris.com/company/sustainability/">https://www.aleris.com/company/sustainability/</a> ). The H&S policy can be found at <a href="https://www.aleris.com/company/health-and-safety/">https://www.aleris.com/company/health-and-safety/</a> in the report the commitment can be found from p. 9 and p. 22 onwards.

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The global VP for Health, Safety and Environment has responsibility for ASI at group level; the responsibility for ASI implementation at the Duffel plant is delegated to a senior local manager.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid ISO 14001:2015 Certificate, based on a good implemented Environmental Management system.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has social management systems implemented, covering health & safety as well as work related issues. Several trade unions are present on plant level, worker representatives participate in meetings, committees etc. Periodic external audits are conducted by public authorities.
2.4 Responsible Sourcing	Conformance	All suppliers are evaluated on risks concerning social, safety, governance and environmental issue.
2.5 Impact Assessments	Conformance	Impact Assessment is covered by the Risk Analysis which is part of the Environmental and Occupational Health and Safety Management system. The Risk Analysis is carried out on a regular basis and in the case of an occurrence or change.
2.6 Emergency Response Plan	Conformance	An effective Emergency Response Plan is in place. It was developed together with internal and external experts in consent with local operational forces.
2.7 Mergers and Acquisitions	Conformance	Mergers and acquisitions are the responsibility of Aleris global but not the local site. It is stated in the Code of Ethics, that in the case of potential mergers and acquisitions both local and international laws and regulations must be fulfilled.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestment are the responsibility of Aleris global and are executed at local level. In the case of a recent temporary shutdown, due to the sale of the extrusion department, staff members were moved to other departments of Aleris Aluminum Duffel BVBA or taken over by the new owner under the same conditions.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	Aleris Aluminum Duffel BVBA recently published its first sustainability report "Beyond Aluminium 2018". It provides information about material impacts and is related to the Aleris global sustainability report "Beyond Aluminium 2017", which follows GRI reporting guidelines. The Aleris Aluminum Duffel BVBA report can be found here <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> and the Aleris global sustainability report here: <a href="https://www.aleris.com/company/sustainability/">https://www.aleris.com/company/sustainability/</a> .
3.2 Non-compliance and liabilities	Conformance	The Entity has well established systems to avoid legal non-compliances and liabilities. Aleris Aluminum Duffel BVBA states in its sustainability report "Beyond Aluminium 2018", that in 2016, 2017 and 2018 no complaints, fines, judgements, penalties or financial sanctions were imposed by the government (p. 25 at <a href="https://www.aleris.com/wp-content/uploads/2019/05/CSR-report-Duffel_FINAL.pdf">https://www.aleris.com/wp-content/uploads/2019/05/CSR-report-Duffel_FINAL.pdf</a> ).
3.3a Payments to governments (legal and contractual)	Conformance	Aleris Aluminum Duffel BVBA states in its sustainability report "Beyond Sustainability 2018", that all payments to governments (fees, taxes etc.) are based on legal and/or contractual basis and are in accordance with the Aleris anti-corruption policy (p. 25 at <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ).
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	Aleris Aluminum Duffel BVBA identifies in its sustainability report "Beyond Sustainability 2018" its main stakeholders/interested parties with their main requirements. It informs that in the last two years two complaints were made regarding noise and smell. Measurements were taken to lower noise and smell levels. Neighbours can contact the plant 24/7 by phone or email.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Environmental Life Cycle Assessment reports for the Entity's main automotive products are carried out since 2012. In 2018 the Entity

CRITERION	RATING	COMMENT
		started to carry out the Environmental Life Cycle Assessment on Non-Automotive products in conformance with ISO 14040:2006 and ISO 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Life Cycle Assessments are available for automotive and non-automotive products and can be requested by clients. Information about LCA are also in the sustainability report (p. 8 and p. 9).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Life Cycle Assessments for automotive and non-automotive products were conducted and reported in compliance with ISO 14040 and ISO 14044. LCA can be found on the Aleris Aluminum Duffel BVBA webpage: ( <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ).
4.2 Product design	Conformance	The Customer To Design (CTD) tool allows product designers to have a rough estimation of potential Global warming potentials for new products in an early stage.
4.3a Aluminium Process Scrap (targets)	Conformance	Scrap and recycle targets are in place and also a plan to develop processes to recover scrap of customers.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Scrap of aluminium is separated by Aluminium alloys and grades in bins for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Aleris Aluminum Duffel BVBA is working together with the European Aluminium Association to promote end-of-life recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Aleris Aluminum Duffel BVBA is an active member of the EAA to promote the collection of end-of-life vehicle scrap. Various Cooperation with EAA and universities is ongoing.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Greenhouse Gases (GHG) are accounted, tracked and reported as needed from Government EU-ETS Statement. Also, the Aleris Aluminum Duffel BVBA sustainability report 2018 contains information about GHG emissions (see <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section E "Energy and Greenhouse Gas Emissions -Reducing Intensity"; page 14).

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	Greenhouse Gas emission reductions measures and targets are part of Aleris Aluminum Duffel BVBA sustainability report 2018 ( <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section "Energy and Greenhouse Gas Emissions -Reducing Intensity"; page 14).
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	Environmental Program includes reduction program for air emissions of CO <sub>2</sub> and dust to mitigate adverse impacts to the environment and human health. Relevant air emissions are reported to Government on a yearly base and added in the Aleris Aluminum Duffel BVBA sustainability report (see section 'Emission to Air' on page 14 of the sustainability report 2018: <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ).
6.2 Discharges to Water	Conformance	Water is primarily used for cooling as part of the production process. Water discharges are monitored on a monthly basis. To mitigate adverse impacts to the environment and human health from discharges to water, the Entity implemented a water treatment process. Also, the Environmental program contains measures to reduce wastewater impact. See section "Managing Water Use Responsibly" on page 17 of the sustainability report 2018 ( <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Risk Analysis is part Environmental Management System and covers emissions to air, land and water for rolling mill and for cast house. Areas with high risk are identified and plan for reducing risk is in place.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The emergency plan covers leaks and spillage. A Preventive maintenance system is in place to do regular and risk-based checks of systems and equipment for leakage and spills.



CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>A Procedure on how to handle and report of leaks ad spillage is in place. Environmental incidents are reported to the applicable governmental department. The one and only spill was recorded and reported to governmental service in 2017 (see <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section: Avoiding soil contamination; page 17).</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Reporting of spills is part of annual environmental/ sustainability report and covered by the implemented ISO 14001:2015 system. See Aleris Aluminum Duffel BVBA sustainability report "Beyond Aluminium 2018", <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section 'Avoiding soil contamination' on page 17).</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>Waste management is designed according Waste Management Hierarchy. Regular reports to legal authority have been sent on yearly base. The Entity is partnering with its customer to:</p> <ul style="list-style-type: none"> <li>• understand their key business and sustainability drivers to initiate new product development</li> <li>• implement closed-loop manufacturing processes to help them reduce waste and incorporate more recycled content into their products</li> <li>• pursue life cycle assessments (LCAs) and environmental certification to quantify the environmental benefits of certain products.</li> </ul> <p>(see Aleris Aluminum Duffel BVBA sustainability report 2018 at <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> Section "Waste Management" on page 16).</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Waste management is designed according Waste management Hierarchy. Types and Volumes of wastes and type of disposal are reported in the yearly IMJV- Afva Report sent to governmental. Report contains a waste statistic for hazardous and non-hazardous waste. Also, the Aleris Aluminum Duffel BVBA sustainability report contains information about waste management (<a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a>. See section "Waste Management" on page 16).</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	For each type of dross different containers are available for collection in the cast house. Collected dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a further subcontractor to be recycled as well.
6.8b Dross (recycling)	Conformance	For each type of dross different containers are available for collection in the cast house. Collected dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a further subcontractor to be recycled as well.
6.8c Dross (review of alternatives)	Conformance	All dross is recycled - no landfilling of dross residues.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity identified and mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	A risk assessment including water-related risks in the area of influence is part of the Environmental Management System. No significant entities material water related risks were identified.
7.2a Water management (management plans)	Not Applicable	Not applicable as no material water related risks were identified. However, water management is part of the Environmental Management System.
7.2b Water management (monitoring)	Not Applicable	Not applicable as no material water related risks were identified. However, monitoring the effectiveness of the plan is planned for the next Management review, including ASI requirements.
7.3 Disclosure of water usage and risks	Conformance	Water usage and waste water are part of sustainability report and the annual IMJV Water Report. The Aleris Aluminum Duffel BVBA sustainability report can be downloaded from ( <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ). See section "Managing Water Use Responsibly" on page 17).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Risk assessment and investigation of biodiversity impacts from activities on the Aleris Aluminum Duffel BVBA premises and Entity's area of influence was carried out by an external party. A detailed Improvement plan was developed. Plant species were mapped and registered. At some locations within the plant property non-endemic species were identified. A number of Polygonum plants were found and will be removed.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the results of the Biodiversity Assessment an Action Plan for the years 2018 to 2023 was prepared. The biodiversity study/assessment and biodiversity plan were presented to public and internal stakeholders at the beginning 2019.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Biodiversity Action Plan is part of Biodiversity Assessment Report. An Action Plan is in place with time-bound targets to address material impacts identified in the risk assessment. The Action Plan was developed via a consultative

CRITERION	RATING	COMMENT
		approach and designed in accordance with the biodiversity mitigation hierarchy by an external specialist.
8.2c Biodiversity management (reporting)	Conformance	The Biodiversity study and Biodiversity Action Plan were presented to the public and internal stakeholders on 17 January, 2019. Outcomes of biodiversity study are part of the Aleris Aluminum Duffel BVBA sustainability report.
8.3 Alien Species	Conformance	With the first Biodiversity study some Alien Species plants were identified. The Entity implemented an Action Plan to eliminate these alien Species plants and how to prevent introduction of alien species in the future.
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 communicates in its sustainability report the commitment to support the protection of the internationally proclaimed human rights and expects its suppliers to do so. It conducted a supplier survey recently and has on its website a public disclosure to the California Transparency in Supply Chains Act (see <a href="https://www.aleris.com/wp-content/uploads/2015/05/CA_Transparency_in_Supply_Chains-Statement_Final1.pdf">https://www.aleris.com/wp-content/uploads/2015/05/CA_Transparency_in_Supply_Chains-Statement_Final1.pdf</a> ).
9.1b Human Rights Due Diligence (process)	Conformance	The Entity requests its suppliers to comply with its Code of Conduct. It introduced processes to comply with the conflict mineral disclosure obligations. Aleris Aluminum Duffel BVBA conducted a supplier survey to identify potential risks and negative impact of its suppliers on the human rights. The Entity identified and addresses the topics of its main stakeholder

CRITERION	RATING	COMMENT
		groups in the sustainability report (p. 3). Aleris is founding member of ASI.
9.1c Human Rights Due Diligence (remediation)	Conformance	Aleris Aluminum Duffel BVBA communicates in its sustainability report its commitment to comply with the UN human rights and its expectation, that suppliers do the same. The plant conducted a supplier survey to identify potential risks and negative impact of its suppliers on the human rights. Aleris Aluminum Duffel BVBA identified and addresses the topics of its main stakeholder groups in the sustainability report (p. 3). Aleris is founding member of ASI.
9.2 Women's Rights	Conformance	Aleris commits in its Code of Conduct to not tolerate any form of discrimination and to gender diversity. Gender diversity is also reported in the published sustainability report (p. 20).
9.3 Indigenous Peoples	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium and there is no cultural and sacred heritage affected.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, as there are no indigenous people in Belgium. No resettlements took and take place - no residents are affected by the site.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable, as there are no indigenous people in Belgium and no resettlement took or take place - no residents are affected by the site.
9.7a Local Communities (rights and interests)	Conformance	The Entity is in close contact with its neighbours and periodic consultations take place. Stakeholders with their interests were identified and mapped in the sustainability report. All rights of the neighbours are covered by Belgian law.
9.7b Local Communities (impacts)	Conformance	Aleris identifies its neighbours as important stakeholders and mapped their interests in the sustainability report (see p. 4 of the sustainability report <a href="https://www.aleris.com/company/sustainability/">https://www.aleris.com/company/sustainability/</a> ). Aleris Aluminum Duffel BVBA is in close contact

CRITERION	RATING	COMMENT
		with its neighbours, periodic consultations take place to identify and solve any negative impact on the livelihoods of the neighbours.
9.7c Local Communities (livelihoods)	Conformance	Aleris identified its neighbours as important stakeholders and mapped their interests in the sustainability report (see p. 4 of the sustainability report <a href="https://www.aleris.com/company/sustainability/">https://www.aleris.com/company/sustainability/</a> ). It is in close contact with its neighbours, periodic consultations take place to identify and solve any negative impact on the livelihoods of the neighbours.
9.8 Conflict-Affected and High-Risk Areas	Conformance	There are no activities in Conflict-Affected and High-Risk Areas. The code of conduct and Aleris policies prohibit activities in conflict zones.
9.9 Security practice	Not Applicable	Plant security is provided through the Entity's own staff, who are trained accordingly and have to pass an exam. A code of conduct for security personnel exists.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The rights of workers representation are regulated by Belgian law. Several trade unions are present at the company, they are included in the representation of the workers' rights (e.g. workers council, health & safety committee etc.). Aleris Aluminum Duffel BVBA communicates its commitment to the freedom of association in the sustainability report and expects the same from its suppliers (see Aleris Duffel sustainability report at p. 20, p 22 etc. at <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> ).
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Aleris Aluminum Duffel BVBA communicates its commitment to collective bargaining agreement in the sustainability report and expects the same from its suppliers. Collective bargaining agreements exist on national, sectoral and company level.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Not applicable, as freedom of association and collective bargaining are guaranteed by Belgian law.
10.2a Child Labour (minimum age)	Conformance	Child labour is prohibited in Belgium. No work is allowed below of 15 years, the youngest employees are at least 18 years old.

CRITERION	RATING	COMMENT
10.2b Child Labour (hazardous)	Conformance	Child labour is prohibited in Belgium. No work is allowed below 15 years, workers under 18 are prevented from carrying out hazardous work by Belgian law. The youngest employees are at least 18 years old.
10.2c Child Labour (worst forms)	Conformance	Child labour is prohibited in Belgium. Aleris Aluminum Duffel BVBA employs workers only above 18 years and requires from its suppliers to fight forced labour, modern slavery and child labour.
10.3a Forced Labour (human trafficking)	Conformance	Forced labour is prohibited in Belgium. Aleris Aluminum Duffel BVBA commits its position in the sustainability report and in the supplier code of conduct. It requires from its suppliers to fight forced labour and modern slavery.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Forced labour is prohibited in Belgium. Aleris Aluminum Duffel BVBA does not require any deposits, fees or advances from its employees. It requires from its suppliers to fight forced labour and modern slavery.
10.3c Forced Labour (migrant workers)	Conformance	Aleris Aluminum Duffel BVBA does not require any deposits, fees or advances from its employees. It requires from its suppliers to fight forced labour and modern slavery.
10.3d Forced Labour (debt bondage)	Conformance	Forced labour is prohibited in Belgium. Aleris Aluminum Duffel BVBA does not hold workers in debt bondage. It requires from its suppliers to fight forced labour and modern slavery.
10.3e Forced Labour (freedom of movement)	Conformance	Aleris Aluminum Duffel BVBA is not involved in forced labour. There is no restriction in the freedom of movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Aleris Aluminum Duffel BVBA is not involved in forced labour. HR department does not hold original documents but only copies of ID's, passports etc. in the workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Aleris Aluminum Duffel BVBA is not involved in forced labour. The time for announced termination of the working contract is regulated by Belgian law.
10.4 Non-Discrimination	Conformance	Discrimination is prohibited by Belgian law. Aleris Aluminum Duffel BVBA states in its sustainability report and in its code of conduct, that discrimination is neither tolerated at the site

CRITERION	RATING	COMMENT
		nor at the suppliers. See also Aleris Aluminum Duffel BVBA sustainability report at p. 20 <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> .
10.5 Communication and engagement	Conformance	Aleris Aluminum Duffel BVBA has direct communication channels between management and workers and their representatives. Workers can contact their representatives or four nominated trust persons to discuss issues on their behalf. A whistle-blower hotline for reporting any issues exists (www.mysafeworkplace.com). It is communicated internally and externally (e.g. in the Aleris sustainability report on p. 29 at <a href="https://www.aleris.com/company/sustainability/">https://www.aleris.com/company/sustainability/</a> ).
10.6 Disciplinary practices	Conformance	Coercion and harassment are forbidden under Belgian law. Permitted disciplinary procedures are documented in the work rules. Implementation of these procedures was verified during the interviews with the workers, the independent worker representatives and the human resources managers.
10.7a Remuneration (living wage)	Conformance	Wages are regulated through the collective bargaining agreement of the sector. The Entity provides additional financial and non-financial benefits for the employees. The Entity requires from its suppliers to pay minimum wages in accordance with local law and to ensure the compensation of living wages according to the local living conditions.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted on a monthly basis to the employees' bank accounts.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working schedules are part of the Entity's work rules.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Aleris Aluminum Duffel BVBA HSE Policy is available in different places in the plant and on the website. The HSE Policy is part of the on-boarding process (see <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section "Unternehmensrichtlinien").



CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Occupational Health and Safety Policy is part of on boarding process and also part of the training for each visitor. The policy is available at several meeting points and in intranet. (see <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section "Unternehmensrichtlinien").
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Health, Safety and Environmental policy contains commitment to compliance to with all applicable Health, Safety and Environmental laws. Policy is included in the safety video, which must be viewed by all employees and visitors when entering the plant (see <a href="https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/">https://de.aleris.com/locations/aleris-aluminum-duffel-bvba-2/</a> section "Unternehmensrichtlinien").
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right to stop unsafe work is one of the principles stated in the Health Safety and Environmental Policy.
11.2 OH&S Management System	Minor Non-Conformance	Although the Entity has a documented Occupational Health and Safety Management System in place, during the plant tour, three gas bottles in the gas storage were identified, which were not secured so they could fall. Immediately after the tour, the bottles were fixed against falling.
11.3 Employee engagement on health and safety	Conformance	A monthly safety committee involves people to review incidents and observations. The Safety committee consists of representatives of blue collar, white collar, human resource and the union.
11.4 OH&S performance	Conformance	The plant is comparing itself against other Aleris facilities by leading and lagging indicators. Departments get feedback on actual indicators every month.