
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA

CERTIFICATE
NUMBER

45

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

20 SEPTEMBER 2019

DATE OF EXPIRY

19 SEPTEMBER 2022

CERTIFIED SINCE

20 SEPTEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Alcoa Aluminerie de Baie-Comeau in Canada,
aluminum smelting, casthouse and administrative
associated facilities.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa Aluminerie de Baie-Comeau
CERTIFICATION SCOPE	Alcoa Aluminerie de Baie-Comeau in Canada, aluminum smelting, casthouse and administrative associated facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium smeltingCasthouse
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	9 – 11 July 2019
AUDIT REPORT SUBMISSION	16 August 2019
AUDIT SCOPE	<p>Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, the Casthouse as part of Smelting.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium smeltingCasthouse <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

20 September 2019 – 19 September 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

19 September 2022

CERTIFICATE
NUMBER

45

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure legal compliance, with the appointment of a competent legal team across organizational functions at corporate, regional and local levels. The Entity has defined policies and procedures to ensure the identification and communication of risks and compliance with the applicable legislation.
1.2 Anti-Corruption	Conformance	The Entity has defined policies and procedures to identify and manage risks against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The defined processes affect all employees in the Entity and subcontractors. The Entity has not received any notification or penalty related to violations of laws in the last 5 years specifically related to anti-bribery and corruption or anti-competitive behaviour. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp
1.3 Code of Conduct	Conformance	The Alcoa Code of Conduct is a corporate policy covering business integrity, business activities, conflicts of interest, anti-corruption, relations with customers and suppliers, and compliance with Human Rights. The Code of Conduct is reviewed regularly and is available in English and French. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp and https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has policies consistent with environmental, social, and governance practices included in the ASI Performance Standard. The Entity holds a valid ISO 14001 certificate and a Health and Safety Policy consistent with but not certified to ISO 45001. There is additional guidance on local application. Corporate policies are also available: Global EHS Policy: https://www.alcoa.com/sustainability/en/environment-health-safety.asp

CRITERION	RATING	COMMENT
		<p>Alcoa Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Senior management endorse, support through provision of resources and regularly review the range of policies which are applicable and well-communicated on site.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Corporate policies are all available on the Alcoa website. http://investors.alcoa.com/corporate-governance/governance-documents https://www.alcoa.com/global/en/who-we-are/values/default.asp https://www.alcoa.com/sustainability/en/environment-health-safety.asp https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p> <p>Local level policies are all available on the intranet and printed copies are available on boards throughout the site and main entrance (public available) in local language. Evidence was reviewed for the engagement, training and communication of those. Evidence, for example, of training and update meetings shows that the policies are well-communicated.</p>
2.2 Leadership	Conformance	<p>The site is well organised to implement the ASI performance standard requirements, under the leadership of the Site Manager. Each area has a designated owner (Single-Point Accountability or SPA) and this was clearly observed during the auditing process.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The site is certified by BNQ to ISO 14001:2015, which is valid to Oct 2020, has a management manual and utilises the Sphera Essential™ system to control and document environmental management non-compliances or findings. Training is in place and the management system appears well implemented and understood.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>Alcoa has an extensive range of social management policies, procedures, standards and guidelines, e.g. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>It can clearly demonstrate effective implementation at a local level, with defined</p>

CRITERION	RATING	COMMENT
		responsibilities, systems for record keeping, action plans and reviews.
2.4 Responsible Sourcing	Conformance	Alcoa has implemented an effective responsible sourcing policy and procedures covering environmental, social and governance issues. Alcoa's Supplier Standards are publicly available at https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf
2.5 Impact Assessments	Conformance	The Entity has effective social and environmental impact assessments that cover changes on site, such as the Anse Du Moulin remediation project. More significant projects are subject to regulatory assessment process.
2.6 Emergency Response Plan	Conformance	An effective Emergency response plan is in place, which has been informed by stakeholder consultation and meets regulatory requirements.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts at a corporate level https://www.alcoa.com/sustainability/en/default.asp . While it conducts extensive local engagement and meets its regulatory reporting requirements which are publicly available, consideration should be given to site reporting on its performance and the context of its material impacts.
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses through regulatory filings ongoing legal action that has the potential to result in fines, information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. Disclosures available here: https://investors.alcoa.com/sec-filings

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has procedures and policies in place relating to anti-corruption. All payments to governments are taxes or tributes made on a legal or contractual basis and are collated and reported in the Annual Report, available on the website. https://investors.alcoa.com/~media/Files/A/Alcoa-IR/documents/annual-reports-and-proxy-information/annual-report-2018.pdf .
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 implemented an accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanism, adequate to address stakeholder complaints, grievances and requests for information relating to its operations, https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line.asp
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides a cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s) via its 2018 sustainability report, p 14 https://www.alcoa.com/sustainability/en/default.asp
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Alcoa 2018 Sustainability report includes a link to the Environmental Product Declaration, which is based on a verified Life cycle analysis https://www.alcoa.com/sustainability/en/default.asp p14.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimizes the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a sophisticated system to separate and record Aluminium alloys and grades and to reuse them.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity only manufactures primary products, although they demonstrate clear processes and actions for handling scrap. The Entity holds a valid ISO 14001:2015 certificate. The Entity's strategy includes a goal to increase recycling on an ongoing basis. This strategy is tracked as part of the regular dashboard and meetings.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity only manufactures primary products, although they demonstrate clear processes and actions for handling scrap. The Entity holds a valid ISO 14001:2015 certificate. The Entity promotes end-of-life recycling through local and national activities through initiatives such as active membership to The Recycling Partnership, the biggest aluminium recycling organization in North America.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Alcoa has reported its Energy consumption and GHG Emissions at organization level publicly in its 2018 sustainability report. (https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf , page 53 and page 56). Alcoa Baie Comeau has reported its GHG Emissions to Quebec Province under the Quebec Regulatory Requirement for calendar year 2018.
5.2 GHG emissions reductions	Conformance	The Entity has published time-bound GHG emissions reduction targets and has implemented a plan to achieve these targets. The targets cover the material sources of Direct and Indirect GHG Emissions. (https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf , page 53)
5.3a Aluminium Smelting (management system)	Conformance	The plant has a greenhouse gas reporting and calculation system that complies with the Emissions Planning Regulations. An annual emissions audit is conducted by an external auditor. A report is submitted annually.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has demonstrated that the Scope 1 and Scope 2 GHG emissions from the production of Aluminium is at a level below 8 tonnes CO ₂ -eq per metric tonne in year 2017 and 2018.

CRITERION	RATING	COMMENT
5.3c Aluminium Smelting (after 2020)	Not Applicable	No smelters are planned to be started after 2020 therefore this criterion is non-applicable.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies and reports air emissions to the Quebec Ministry of Environment. The Entity identifies air emissions that have adverse effects on humans or the environment and implement plans to minimise these adverse impacts.
6.2 Discharges to Water	Conformance	The Entity monitors and reports in accordance with the operating permit. The permit requires the facility to maintain an inventory of water discharge by source, methodology for determining discharge and monitoring records. When there are overruns of standards or criteria, government authorities are made aware and Alcoa Baie Comeau analyzes the situation and puts corrective measures in place to find the cause and put corrective measures in place to remedy the situation. The plan to minimize adverse impacts is submitted to the governmental authorities and carried out accordingly.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts assessments of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity holds a valid ISO 14001 certificate, has completed risk assessments of spill and leakage potential, has an inventory of chemical and product storage with contamination potential. The Entity has an emergency plan and communication protocol. The Entity defines through the emergency plan how and when to report a spill including to governmental authorities. The Entity has an incident recording and monitoring procedure and adequate training on the prevention and control of spills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place to disclose to affected parties the volume, type and potential impact of significant Spills immediately after an incident. Evidence shows these procedures are followed in the event of an incident.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses Impact Assessments of the Spills and remediation

CRITERION	RATING	COMMENT
		actions taken, and reports publicly on an annual basis, https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf (p.75)
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has disclosed to the Ministry of Environment, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods. The quantity of hazardous and nonhazardous waste and associated disposal methodology is published at the corporate level in the sustainability report. (https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf , page 65-67)
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)	Conformance	The Entity has an SPL storage building, where SPL is stored prior to shipment. The storage is inspected quarterly in line with legal requirements.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has demonstrated that it is in the continuous process of optimizing the recovery and recycling of carbon and refractory materials
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity is pretreating the SPL before it is landfilled in an authorized landfill. There are no adverse impacts to the environment associated with the landfilling of the treated SPL.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has conducted many reviews and made several attempts in the year 2018 to identify SPL recycling options.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity pre-treats and landfills the SPL. The SPL is not sent to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity currently maximises the recovery of aluminium by treatment of Dross and Dross residues.
6.8b Dross (recycling)	Conformance	Alcoa Baie Comeau Facility is in process to maximize the recycling of treated Dross residues.
6.8c Dross (review of alternatives)	Conformance	The Entity is regularly reviewing alternative options to the landfilling of Dross residue.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in Watersheds in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity has a water management plan with actions/controls to mitigate adverse impacts.
7.2b Water management (monitoring)	Conformance	The Entity is certified to ISO 14001: 2015 certification. In line with the ISO 14001 certification requirement, the Entity has set goals, measurable targets, monitoring, reviews and assessments of effectiveness of water management plans. The water use and material water-related risks at a corporate level are published in the sustainability report (https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf , page 68-69)
7.3 Disclosure of water usage and risks	Conformance	The sustainability report containing the Entity's water use and material water-related risks is publicly available, https://www.alcoa.com/sustainability/en/default.asp (p.68-69)
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Alcoa has used an external firm (WSP) to assess the risks and impacts on biodiversity for all of its activities and the Entity's Area of Influence. This report is an up to date risk

CRITERION	RATING	COMMENT
		assessment of biodiversity impacts from activities.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Alcoa has used an external firm (WSP) to assess the risks and impacts on biodiversity for all of its activities. This report is an up to date risk assessment of biodiversity impacts from activities. It includes a study identifying the risks and a proposed action plan to mitigate the risks.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Alcoa has used an external firm to assess the risks and impacts on biodiversity for all of its activities. The Biodiversity Action Plan proposes developing controls using the 'mitigation hierarchy' to avoid, minimise, rehabilitate or offset impacts on biodiversity.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	It was evidenced that the Entity carries out biodiversity reporting; the report developed by WSP has been issued recently in June 2019, however a minor non-conformance was raised as the achieved biodiversity outcomes have not been shared with stakeholders, or made publicly available.
8.3 Alien Species	Conformance	Alcoa Baie Comeau has a system in place to check incoming boats for invasive species. In addition, there is a Canadian program on ballast water management to limit the introduction of Invasive Alien Species.
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 Alcoa Policy states the Entity's commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights,

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		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has a process in place for the remediation of Human Rights policy breaches.
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, that are consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Equal Employment Opportunity Policy is available on the Alcoa's website (https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf)
9.3 Indigenous Peoples	Conformance	The Entity implements policies and processes to ensure respect for the rights and interests of Indigenous Peoples, that are consistent with international standards, including ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	It was evidenced through stakeholder interviews and reviews of impact assessments that the Entity has consulted and cooperated with the Indigenous Peoples concerned to obtain their free and informed consent for any new projects or major changes that may have significant impacts, and it was evidenced that those major changes have had no impact on Indigenous Peoples in the area.
9.5 Cultural and sacred heritage	Conformance	It was evidenced through stakeholder interviews and reviews of impact assessments that there is no impact from the Entity's activities on sacred or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity strictly operates within the boundaries of its property and no people live within those, therefore there are no resettlement issues to be addressed by the Entity and this criterion is non-applicable.

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9.6b Resettlements (where unavoidable)	Not Applicable	The Entity strictly operates within the boundaries of its property and no people live within those, therefore there are no resettlement issues to be addressed by the Entity and this criterion is non-applicable.
9.7a Local Communities (rights and interests)	Conformance	The Entity meets the ASI criterion concerning legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources. The site meets Canadian local regulations and the community partnership that it is extensively involved in has been cited as Best Practice by UNESCO.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local community livelihoods resulting from its activities.
9.7c Local Communities (livelihoods)	Conformance	The community has innovative, best practice partnership projects, which are financially supported by the Alcoa Foundation and involve Baie Comeau employees. There is deep community engagement which seeks to explore opportunities to respect and support community livelihoods. http://mavillemavoix.com/
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has processes in place to assess and manage the risks that it or its supply chain contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity and its private security contractors follow processes to ensure respect for Human Rights in line with recognised standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There are 2 Labour Unions and significant representation and engagement with unions on the site. The legal requirements of freedom of association are met by the site are in line with the ILO Conventions C87 and C98.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of workers to collective bargaining, and adheres to collective bargaining agreements where such agreements exist. A new collective agreement was concluded at the site in May 2019.

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10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Freedom of Association and the Right to Collective Bargaining are not restricted in Canada, therefore this criterion is non-applicable. A new collective bargaining agreement has been concluded in May 2019 as per legal requirement.
10.2a Child Labour (minimum age)	Conformance	The Entity has policy's, codes of conduct and procedures in place to ensure no Child Labour as defined in ILO Conventions C138 and C182 and Canadian law.
10.2b Child Labour (hazardous)	Conformance	Human Rights Policy and Code of Conduct both prohibit the use of child labor. Procedures on site were seen to be effective therefore there is no opportunity for child labour hazardous working.
10.2c Child Labour (worst forms)	Conformance	Human Rights Policy and Code of Conduct both prohibit the use of child labor. Procedures on site were seen to be effective therefore there is no opportunity for children to be involved in the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. It does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. It does not require recruitment or other fees to be paid by worker.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. No deposits or security payments are required at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. No workers are held in Debt Bondage or forced to work in order to pay off a debt.

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10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. There is no unreasonable restriction of the freedom of movement of Workers in the workplace. There is no on-site housing
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. There is no retention of original copies of Workers' identity papers, work permits or travel documents. A training record is kept in a system workers can access and there are no restrictions on worker access.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Human Rights policy and code of conduct are implemented effectively through site procedures and workers have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity has policies, a code of conduct and procedures in place that effectively ensure equal opportunities and it does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker.
10.5 Communication and engagement	Conformance	The collective agreement between workers, union and the Entity as well as operating procedures and culture 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	The Entity has Policies, a Code of Conduct and procedures in place to ensure no 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's Policy, Code of Conduct and procedures are effective in ensuring the rights of Workers to a living wage and ensuring that wages paid for a normal working week shall always meet at least a legal or industry

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		minimum standard and are sufficient to meet the basic needs of Workers and to provide some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments that are timely, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented, communicated and regularly reviews its Occupational Health and Safety Policy that senior management has endorsed and supports through provision of resources.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies its Health and Safety Policy to all Workers and Visitors present in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Policy has a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Policy and procedures clarify and implement the workers' right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity has various mechanisms, including joint health and safety committees, by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance using leading and lagging indicators, benchmarks its performance and strives to continuously improve.