
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**ALUDIUM
PREMIUM
ALUMINIUM**

CERTIFICATE
NUMBER

57

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

13 DECEMBER 2019

DATE OF EXPIRY

12 DECEMBER 2022

CERTIFIED SINCE

13 DECEMBER 2019

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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CERTIFICATION SCOPE

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

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

www.aluminium-stewardship.org

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Aludium Premium Aluminium
ENTITY NAME	Aludium Amorebieta Facility
CERTIFICATION SCOPE	The Aludium Amorebieta plant, including aluminium re-melting/refining casthouses, semi-fabrication and administrative facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Aluminium Re-melting/Refining
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	21 – 23 October 2019
AUDIT REPORT SUBMISSION	14 November 2019
AUDIT SCOPE	<p>The Aludium Amorebieta plant, including aluminium re-melting/refining casthouses, semi-fabrication and administrative facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Aluminium Re-melting/Refining <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

13 December 2019 – 12 December 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

12 December 2022

CERTIFICATE
NUMBER

57

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented system to ensure legal compliance with competent legal team and compliance across organizational functions. The Entity has defined policies and procedures to ensure the identification of risks and compliance with the applicable legislation which allows the communication to all persons of the Entity. This process is led by the compliance council and is audited and reviewed annually by external consultants. The commitments have been documented and communicated internally and externally in the code of conduct and in the sustainability report, both published on the company website:</p> <p>https://aludium.com/es/aludium/mision-vision-valores/ and https://aludium.com/es/aludium/sostenibilidad/</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has defined a code of conduct 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 the people of the Entity and the subcontractors. It was not evidence that the company has received any notification or penalty related to violations of laws in the last 5 years related specifically to anti-bribery and corruption or anti-competitive behavior. No evidence is detected that the Entity has had or has permanently or temporarily suspended its activity license due to corruption or anti-competitive behavior problems.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has defined a code of conduct that includes all the commitments and values related to the key aspects of the business, activity, conflicts of interest, relations with customers and suppliers and internal relations and compliance with Human Rights. The code of conduct is reviewed regularly. The Entity publishes the values and commitments of its code of conduct on the company website:</p> <p>https://aludium.com/es/aludium/mision-vision-valores/ and also by accessing to the sustainability report: https://aludium.com/es/aludium/sostenibilidad/</p>

CRITERION	RATING	COMMENT
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established a policy consistent with environmental, social, and governance practices included in ASI standard at local and global levels. The company's policies are accessible on the company website: https://aludium.com/es/aludium/la-politica-de-calidad-de-aludium/ , https://aludium.com/es/care/politica-de-energia/ and https://aludium.com/es/care/politica-de-medio-ambiente-salud-y-seguridad/ . The Entity publishes the values and commitments of its code of conduct on the company website (page 5): https://aludium.com/es/aludium/mision-valor-vision-valores/ and by accessing the sustainability report (pages 35,36,37): https://aludium.com/aludium/the-sustainability-report-of-aludium/. The Entity also has valid ISO 14001, ISO 50001 and OHSAS 18001 certificates which is current for the Entity's certification scope.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has established a policy consistent with environmental, social, and governance practices included in ASI standard at local and global levels. Policies are included in the Quality, Health, Safety and Environment system manual and are endorsed by senior management. Policies are reviewed at least once per year by senior management during the management review meeting. The company's policies are accessible on the company website: https://aludium.com/es/aludium/la-politica-de-calidad-de-aludium/ , https://aludium.com/es/care/politica-de-energia/ and https://aludium.com/es/care/politica-de-medio-ambiente-salud-y-seguridad/ . The Entity publishes the values and commitments of its code of conduct on the company website (page 5): https://aludium.com/es/aludium/mision-valor-vision-valores/ and by accessing the sustainability report (pages 35,36,37): https://aludium.com/aludium/the-sustainability-report-of-aludium/. The Entity also has valid ISO 14001, ISO 50001 and OHSAS 18001 certificates which is current for the Entity's certification scope</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has established a policy consistent with environmental, social, and governance</p>

CRITERION	RATING	COMMENT
		<p>practices included in ASI standard at local and global levels. The company's policies are accessible on the company website: https://aludium.com/es/aludium/la-politica-de-calidad-de-aludium/ , https://aludium.com/es/care/politica-de-energia/ and https://aludium.com/es/care/politica-de-medio-ambiente-salud-y-seguridad/ . The Entity publishes the values and commitments of its code of conduct on the company website (page 5): https://aludium.com/es/aludium/mision-vision-valores/ and by accessing the sustainability report (pages 35,36,37): https://aludium.com/aludium/the-sustainability-report-of-aludium/. The Entity also has valid ISO 14001, ISO 50001 and OHSAS 18001 certificates which is current for the Entity's certification scope.</p>
2.2 Leadership	Conformance	<p>The Entity has a senior management representative that supports through the provision of resources and the periodic review of the Policies. The Entity Senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has a Health, Safety and Environment responsibility management system aligned with the needs and expectations of the stakeholders (external and internal). The Entity also has a valid ISO 14001:2015, OHSAS 18.001 and ISO 50001 certificates.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has a Health, Safety and Environment and social responsibility management system aligned with the needs and expectations of the stakeholders (external and internal). The Entity also has a valid SO 14001:2015, OHSAS 18.001 and ISO 50001 certificates.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has a responsible sourcing program as part of its purchasing process. The Entity integrates social, environmental and health and safety evaluation criteria in their supplier selection process. The Entity policies are accessible on the company website: https://aludium.com/es/aludium/la-politica-de-calidad-de-aludium/ , https://aludium.com/es/care/politica-de-energia/</p>

CRITERION	RATING	COMMENT
		<p>and Health, Safety and Environment policy at https://aludium.com/es/care/politica-de-medio-ambiente-salud-y-seguridad/ . The Entity publishes the values and commitments of its code of conduct on the company website: https://aludium.com/es/aludium/mision-vision-valores/ and by accessing the sustainability report: https://aludium.com/ and https://aludium.com/es/aludium/sostenibilidad</p>
2.5 Impact Assessments	Conformance	<p>The Entity has a formal procedure for assessing environmental, social, cultural and Human Rights aspects of any new project or major changes to existing facilities. This consists in an internal risk assessment of all the above aspects, complemented by an annual Human Rights self-assessment procedure for the whole site which includes gender risk; this is based on guidance from a recognised international not-for-profit organisation. For environmental aspects, an assessment is carried out and authorisation from local authorities is obtained. The new major projects that happened since the Entity joined ASI have adequately followed the procedure. A recent example of major project carried out was putting in operation the rotary furnace at Amorebieta where the full impact assessment was carried out, as per Aludium's procedures.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity have site specific emergency response plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and relevant agencies. The emergency response plans are periodically tested through drills. Emergency drills are coordinated with the government external agencies and with suppliers-subcontractors. The Entity has valid ISO 14001:2015 and OHSAS 18001 certificates</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has a corporate Due Diligence procedure aligned with Organization for Economic Co-operation and Development guidelines. This procedure reviews environmental, social and governance issues for mergers and acquisitions. These elements are governed by the Entity's corporate Area. There have been no mergers and acquisitions by the Entity since its foundation.</p>

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has a corporate Due Diligence procedure aligned with Organization for Economic Co-operation and Development guidelines. This procedure reviews environmental, social and governance issues for closure, decommissioning and divestment. These elements are governed by the Entity's corporate Area. No Closure, Decommissioning and Divestment have been performed by the Entity since its foundation.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The Entity prepares an annual sustainability report and publishes it for all stakeholders on the company website https://aludium.com/es/aludium/sostenibilidad
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law through their annual Sustainability reporting which is accessible to all stakeholders through publication on the company website: https://aludium.com/es/aludium/sostenibilidad/ . It was evidenced there was no significant fines, judgments, penalties or non-monetary sanctions for non-compliance.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. The Entity performs independent regulatory external audits by accredited agencies.
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 accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the web: https://aludium.com/es/contacto/contact-form/ . It was evidenced there was no legal actions, threatened or ongoing, regarding anti-competitive behaviour and no violation of anti-

CRITERION	RATING	COMMENT
		competition laws. The Entity also has valid ISO 14001:2015 and OHSAS 18001 certifications.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	<p>The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used, e.g., through life cycle assessments (LCA) studies performed by independent consultant. The LCA was developed for the site, which is cradle to gate including impacts from the raw material supply, transportation to the manufacturer and manufacturing stages, also includes the boundaries of LCA.</p> <p>However, a minor non-conformance was raised as Aludium's life cycle study did not contemplate the recent changes in processes such as the restart of the foundry in Alicante or the new furnace in Amorebieta. These were identified as aspects that will be relevant, but these impacts are not evaluated with data.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA is available upon request. It was evidenced there was no requests have been received.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used. Public communication on LCA includes public access to the LCA information and its underlying assumptions including system boundaries. The LCA is published on the Metal and Aluminium Sector Associations websites:</p> <p>https://www.fempa.es/portada and https://aluminio.org/.</p>
4.2 Product design	Conformance	The Entity has a formal process for the management of product design, with monthly follow-up of projects, to improve sustainability, including the impacts of the environmental life cycle of the final product. The central Research and Development function manages the product design process for the Entity's sites. Initiatives include adjusting alloy composition, collaborating with suppliers of chemical products and reviewing the use of acids. The Entity has set clear objectives to improve sustainability. An

CRITERION	RATING	COMMENT
		example of this is the objective of reaching zero scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies targeting 100% scrap for collection, recycling and/or reuse, supporting a circular economy thinking. The Entity offers services for the smelting of aluminum that technically adjusts to the technology in place.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has got adequate systems to separate Aluminium alloys and grades for recycling, such as the Standard for Segregation by Alloy, and an appointed manager in charge of carrying out the controls. There is a clear process for assessing the quality of the internal scrap received, and there are plans in place to extend this assessment to external scrap that may be bought in the future.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Aludium is an active member of ARPAL, a non-profit association with the objective of promoting the recycling of aluminium containers and improving overall recycling rates. The Entity has a strong recycling capacity and implements a recycling strategy, including specific timelines, activities and targets. The strategy is aligned with the waste hierarchy to maximise recycling and contribute to the improvement of aluminium recycling in the industry as a whole.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is an active member of ARPAL, ARPAL is a non-profit association with the objective of promoting the recycling of aluminum containers: https://aluminio.org/ .
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity discloses GHG emissions and energy use in their environmental reporting as part of the annual Sustainability report: https://aludium.com/es/aludium/sostenibilidad/. GHG emissions are accounted accord the principles Greenhouse Gas Protocol. The GHG emissions has been verified by an external and independent agency. The Entity has valid ISO 14001:2015 and ISO 50001:2011 certificates.</p> <p>However, a minor non-conformance was raised as Aludium because the data published in the sustainability report for emissions are not</p>

CRITERION	RATING	COMMENT
		correct. The emissions data of Alicante are not accounted in the total emissions data.
5.2 GHG emissions reductions	Minor Non-Conformance	<p>The Entity undertakes to address global climate change actions and has a GHG emission control system that covers its material sources annually. Emission data is communicated to all stakeholders by the sustainability report on the company website: https://aludium.com/es/aludium/sostenibilidad/, The Entity monitors and analyzes GHG and energy performance. The Entity has an emission forecast for 2021-2025. Energy and GHG audits are performed by an independent assurance provider on an annual basis. The Entity has valid ISO 14001:2015 and ISO 50001:2011 certificates.</p> <p>However, a minor non-conformance was raised as Aludium did not published the emission reduction objectives with their action plans. The emission reduction objectives were not published in the sustainability report. There are emissions performance forecasts for the 2021-2025 period, but they do not reflect an exact goal with action plans aimed at achieving them.</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	Minor Non-Conformance	<p>The Entity has good systems and procedures to minimize impacts and to report on emissions to air to regulators and internally to group level. The aggregated performance is presented in the annual report available on the company website: https://aludium.com/es/aludium/sostenibilidad/ (p.30) The Entity has a permit for emissions and complies with the limits established by the authorities. The Entity has a valid ISO 14001 certificate.</p> <p>However, a minor nonconformity was raised since Aludium has not formally defined the action plans to achieve the objectives, which does not allow for effective follow-up.</p>

CRITERION	RATING	COMMENT
6.2 Discharges to Water	Conformance	<p>The Entity has good systems and procedures minimize impacts and to report on discharges to water to regulators and internally. The Entity has carried out a risk assessment and has developed and develops action plans to minimize adverse effects and ensure that all regulatory requirements are met. All sources of water supply, use and discharge have been inventoried in a water balance. There are audit reports made by an accredited external company on the discharges made. The aggregated performance is presented in the annual report available on the company web: https://aludium.com/es/aludium/sostenibilidad/ (p.30) The entity has a valid ISO 14001 certificate.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity regularly assess major risk related to environmental aspects, potential spills and leakage from the production processes. The Entity has an inventory in the chemical storage plant with potential risks. The entity has a valid ISO 14001 certificate. The entity has a valid OHSAS 18001 certificate.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has an emergency management plan and an external communication protocol. The Entity defines through its standards how and when to report a spill. The Entity has a spill prevention and control procedure in place to prevent and detect spills and leakages. The Entity communicates the risk analysis methodology in its sustainability report: https://aludium.com/es/aludium/sostenibilidad/ . If there were any spills, the Entity would report them at: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126. The Entity has a valid ISO 14001 certificate. The Entity has a valid OHSAS 18001 certificate.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>It was evidenced there was no spills that need to be communicated externally. The Entity has valid ISO 14001:2015 and OHSAS 18.001 certificates.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has good systems and a reporting culture to address and disclose potential significant spills. The Entity has a spill incident communication protocol which defines how and when to report a spill. Although the Entity has</p>

CRITERION	RATING	COMMENT
		not had any significant spills, the Entity reports its spill performance at: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126 .
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a strong strategy on recycling and waste management, which is developed in accordance with the Waste Mitigation Hierarchy. An example of strategy reviewed was the Waste minimization plan which is presented every 4 years; the current plan is running from 2019 to 2022. Several projects and investments on recycling are implemented. On non-hazardous waste, examples of initiatives include the Packaging Minimization plan (2019-2021) and various projects achieved in 2018 which allowed reducing the amount of wood and plastics discarded. Hazardous and non-hazardous waste are managed with a set of strategies with clear timelines. All waste is stored and controlled as necessary and in accordance with applicable regulations and best management practices. All waste generated is treated with authorized transport and treatment companies. Amorebieta is a manager of non-hazardous waste (aluminum scrap) and self-handles the slag generated in both Alicante and Amorebieta. The Entity publicly disclose the waste generation and disposals in the sustainability report: https://aludium.com/aludium/the-sustainability-report-of-aludium/
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals in the sustainability report: https://aludium.com/aludium/the-sustainability-report-of-aludium/ (p.31-33)
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.

CRITERION	RATING	COMMENT
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 maximises the recovery of aluminium from dross and dross residues. The two Aludium sites (Alicante and Amorebieta) work in collaboration to achieve this. Since 2016, Aludium has processed the salt slag in rotary kilns to recover the residual aluminium. The dross generated in the casthouse of Alicante is stored for shipment to Amorebieta, where 100% of it is processed. This has been facilitated notably by the installation of the new rotary furnace which has allowed the dross and slag generated in both plants, Amorebieta and Alicante, to be treated and recycled. A management system and objectives have been set for monitoring the amount of dross generated and recovered.
6.8b Dross (recycling)	Conformance	The Entity maximises the recycling of aluminium from dross and dross residues. The two Aludium sites (Alicante and Amorebieta) work in collaboration to achieve this. The dross generated in the casthouse of Alicante is stored for shipment to Amorebieta, where 100% of it is processed. This has been facilitated notably by the installation of the new rotary furnace which has allowed the dross and slag generated in both plants, Amorebieta and Alicante, to be treated and recycled. A management system and objectives have been set for monitoring the amount of dross that is generated and that can be recovered or recycled. The salt slag, the residue of the rotary furnace of Amorebieta, is taken to an authorized manager (BEFESA). In

CRITERION	RATING	COMMENT
		<p>Befesa they fully value that salt scum, which is environmentally beneficial. Treating it they obtain three products that they sell to the market: metallic aluminum, flux salt (which they resell to Aludium) and the rest is sent to an authorised waste management company in Germany that recycles it into PAVAL™, a material used in the ceramics and cements industry. This component can replace cement used in hot-weather concreting conditions, replaces up to 20% of the cement used and provides superior mechanical properties and durability. Aludium reports its Hazardous Waste including slag waste performance on the Ministry of Environmental Transition's website, where historical data is available up to 2009, http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126</p>
6.8c Dross (review of alternatives)	Conformance	<p>Aludium treats 100% of its dross and there is no dross or dross residue sent to landfill. The two Aludium sites (Alicante and Amorebieta) work in collaboration to achieve full recovery and recycling. The dross generated in the casthouse of Alicante is stored for shipment to Amorebieta, where 100% of it is processed. The salt slag, the residue of the rotary furnace of Amorebieta, is taken to an authorized manager (BEFESA). In Befesa they fully value that salt scum, which is environmentally beneficial. Treating it they obtain three products that they sell to the market: metallic aluminum, flux salt (which they resell to Aludium) and the rest is sent to an authorised waste management company in Germany that recycles it into PAVAL™, a material used in the ceramics and cements industry. This component can replace cement used in hot-weather concreting conditions, replaces up to 20% of the cement used and provides superior mechanical properties and durability. Aludium reports its Hazardous Waste including slag waste performance on the Ministry of Environmental Transition's website, where historical data is available up to 2009, http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126. Aludium also publicly discloses its annual waste generation and disposal methods in its sustainability report,</p>

CRITERION	RATING	COMMENT
		https://aludium.com/aludium/the-sustainability-report-of-aludium / (p.31-33).
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>The Entity has mapped its water withdrawal and use locally and reports through internal environmental reporting. The Entity has implemented a water balance showing water inputs and output flows, sources and destination. The Entity is located in the municipality of Amorebieta, water supply comes from the municipal network. Also, The Entity has permission to withdraw water from a nearby river. The Entity has a valid ISO 14001 certificate.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity assesses water-related risks in Watersheds in its Area of Influence, which is defined as the Aludium Amorebieta plant, including aluminium re-melting/refining casthouses, semi-fabrication and administrative facilities. In 2019, Aludium conducted a water risk assessment using the Aqueduct™ tool developed by the World Resources Institute. The material water risk identified was water-scarcity. The risk level for Alicante was high. An action plan is in place. The Entity communicates its methodology in its sustainability report: https://aludium.com/es/aludium/sostenibilidad/ (p.30)</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has carried out a risk analysis and implements water management plans to minimize adverse effects, with time-bound targets that address material risks identified in criterion 7.1(b). Water consumption targets have been defined for 2019 and 2020, based on maintaining current performance and not exceeding collection permits. The objectives define action plans for consumption control and operational control, with monthly monitoring of the data to identify deviations and new risks. Maps, data and evidence of monthly monitoring were reviewed. Actions already completed include optimisation of the cooling towers, repairing leaks in the drinking water network, and fire protection. Upcoming initiatives to be finalised end of 2019 include checking the input counter rings and installing water meters. In 2018 and so far in 2019, the objectives are met</p>

CRITERION	RATING	COMMENT
		and there are no deviations or new risks, demonstrating effectiveness.
7.2b Water management (monitoring)	Conformance	The Entity monitors and follows the action plans associated with the identified material water risks. Water consumption targets have been defined for 2019 and 2020, based on maintaining current performance and not exceeding collection permits. The objectives define action plans for consumption control and operational control, with monthly monitoring of the data to identify deviations and new risks. In 2018 and so far in 2019, the objectives are met and there are no deviations or new risks, demonstrating effectiveness. Interviews with the environmental technician, the Health, Safety and Environment coordinator and the ASI manager, as well as maps, data tracking on excel, and invoices also demonstrated effective monthly monitoring of water-management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports its water consumptions performance at: http://www.en.prtr-es.es/Informes/fichacomplejo.aspx?Id_Complejo=3126 . The entity communicates the risk analysis methodology in its sustainability report: https://aludium.com/es/aludium/sostenibilidad/ (p.30) The Entity has a valid ISO 14001 certificate
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in its Area of Influence. The Entity has carried out a Biodiversity study. For the assessment of biodiversity impacts, the area of influence comprised of the plant itself, its associated facilities, and the area directly surrounding the plant, including the road San Miguel de Dudea and the nearby river Ibaizabal to the east of the plant where the Entity has permits for water withdrawals and discharges. In the study, the protection biodiversity figures defined in current legislation are used in terms of biodiversity and that can be correlated with the terms of the HCV (High conservation values) methodology, including flora and fauna. The conclusions of the study were that Amorebieta's activities have an overall low impact on biodiversity.

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	<p>The Entity has carried out a Biodiversity study that identifies the risks and establishes an action plan.</p> <p>However, a minor non-conformance was raised since Aludium has not defined the objectives of achievement of the action plans set out in the biodiversity study.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The biodiversity study follows the Mitigation Hierarchy and is consultative; external stakeholders were involved, especially with sources from local and state authorities, as well as experts in the area of biodiversity and the plant employees themselves.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	<p>The biodiversity study and its conclusions are reported publicly in the sustainability report (page 33): https://aludium.com/es/aludium/sostenibilidad/.</p> <p>However, a minor non-conformance was raised since Aludium has not communicated the results achieved.</p>
8.3 Alien Species	Conformance	<p>The Entity has carried out a Biodiversity study that identifies the risks and establishes an action plan, including actions for the protection of native flora and fauna and the fight against invasive species. The biodiversity study and its conclusions are reported publicly in the sustainability report (page 33): https://aludium.com/es/aludium/sostenibilidad/.</p>
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has a Human Rights Policy integrated in its values, outlined in the code, which are

CRITERION	RATING	COMMENT
		publicly available on the company website: https://aludium.com/es/aludium/mision-vision-valores . The code of conduct is aligned with Danish Human Rights Institute guidelines.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has a process to detect the risks associated with human rights violations caused by the effect of its employment practices, in relation to the rights of people employed by the company or seeking employment in the company. The Entity explicitly prohibits any type of violation of human rights in the Human Rights Compliance Validation Procedure.
9.1c Human Rights Due Diligence (remediation)	Conformance	No cause or contribution to adverse impacts on Human Rights has been identified by Aludium's due diligence process, and no claims or remediation processes were initiated by interested parties or vulnerable groups.
9.2 Women's Rights	Conformance	The Entity has an Equality Policy integrated in its values, outlined in the code and the sustainability report, in accordance with the reference regulations and sectoral documents of international rights. The Entity publish their employability of women and their values on the company website: https://aludium.com/es/aludium/mission-vision-values and https://aludium.com/es/aludium/sostenibilidad/ (p.12, 35, 36, 37) The Entity has an equal plan, which is reviewed annually, which promotes equity in the workplace and the inclusion of women in the workplace. There is a committee (Equality Commission) with unions that holds periodic meetings to review information on any possible discrimination and also as a place to report any situation against the code of conduct. Within the collective agreement mechanisms are established to guarantee non-discrimination in relation to opportunities for promotion, development and salary. The entity monitors diversity in employability. In individual and collective interviews with employees and unions, no discriminatory actions are identified.
9.3 Indigenous Peoples	Not Applicable	No presence of indigenous people. This requirement is not applicable for the Certification Scope where the Entity operates.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	No presence of indigenous people. This requirement is not applicable for the Certification Scope where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates as there are no places of worship or sacred places in the area of influence of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable as it has been evidenced that there has been no resettlement due to the Entity's activity. Additionally, the Entity has implemented a procedure at group level to avoid or minimise any potential resettlement and to cover the impacts of any resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable as it has been evidenced that there has been no resettlement due to the Entity's activity. Additionally, the Entity has implemented a procedure at group level to avoid or minimise any potential resettlement and to cover the impacts of any resettlement.
9.7a Local Communities (rights and interests)	Conformance	The Entity demonstrates respect of the legal and customary rights and interests of local communities through its community engagement and corporate sustainability reporting guidelines. This is notably reflected in the Entity's Social Action Protocol, through which Aludium exercises an active participation in the development of the communities in which it is present and therefore of its stakeholders. The Entity's action plan is monitored through performance indicators. The Entity's initiatives include social investment, providing local employment, volunteering, donations of products and services, promotion of biodiversity, joint work with civil society organizations, collaboration with local not-for-profits in the metal industry.
9.7b Local Communities (impacts)	Conformance	The Entity has a Social Action Protocol to promote actions that range from dialogue and social investments, volunteering, donations of products and services, joint work with organizations of civil society, etc.
9.7c Local Communities (livelihoods)	Conformance	The Entity has an action plan, detailing various actions in attracting and retaining talent and diversity as well as the Involvement with the Social Community. The action plan includes

CRITERION	RATING	COMMENT
		contact with local communities to identify opportunities and channel requests or queries. The action plan is monitored through performance indicators.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a corporate Due Diligence procedure aligned with Organization for Economic Co-operation and Development guidelines. This procedure reviews environmental, social and governance issues to not contribute to armed conflict or human right abuses in conflict-affected or high risk areas. These elements are governed at group level. It was evidenced there was no contribution to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity maintains a security contract with a specialized company through a contract and with compliance with the Human Rights policy defined in the code of conduct and reference regulations. The company in charge of security has the appropriate infrastructure, experience and accreditation established by the legislation for compliance with the security activity. The Entity has adequate procedures for the fulfillment of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a Health, Safety and Environment procedures. In these procedures are clearly states the recognition of the principle of freedom of association and the right to join employee organizations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	For the site in the Entity's Certification Scope, there is a freely elected workers council in place and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This criterion is not applicable because Aludium allows Freedom of Association and Right to Collective Bargaining and does not need alternative systems in that area. The Entity has a Company Committee formed by internal members and union delegates. The union elections are carried out following the current legislation. All workers can and do have the right freely to appear within union lists. All workers can freely vote. The Collective Bargaining Agreement is negotiated and agreed with the

CRITERION	RATING	COMMENT
		works committee. The Entity also has a valid OHSAS 18001 certificate
10.2a Child Labour (minimum age)	Conformance	There´s no employment of workers under age of 18 years. Child labour is prohibited in Spain. The Entity does not allow hiring of minors (under 18 years) is not allowed in any position and this was verified with records sighted during the audit.
10.2b Child Labour (hazardous)	Conformance	The Entity has policies and procedures to ensure that minors are not recruited. These procedures clearly state that Aludium will not employ children below the age of 18, and therefore will not employ children for hazardous work. This was verified through the review of employees' files, through interviews with workers and trade-union representatives, and during the site tour.
10.2c Child Labour (worst forms)	Conformance	The Entity has policies and procedures to ensure that minors are not recruited. These procedures clearly state that Aludium will not support or engage in child labour, including the worst forms of child labour. This was verified through the review of employees' files, through interviews with workers and trade-union representatives, and during the site tour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity values defined in the code of conduct prevent the Entity from engaging or supporting Human Trafficking either directly or through any employment or recruitment agencies. All Entity employees have the right to work in a safe and respectful environment; they have union representatives and are also covered by law and mostly by collective agreement. All employees of the Entity have legal contracts and are registered with Social Security. All employees of contractors and recruitment agencies working in the factory must submit information on compliance with labor regulations. All the Entity's employees are hired with formalized contracts . All contract employees must comply with the reference labor and safety regulations. The recruitment company used is a multinational company of recognized prestige that operates according to the SOX law (Sarbanes-Oxley Act
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's recruitment procedures do not allow to require any form of deposit, recruitment fee or

CRITERION	RATING	COMMENT
		advance payment for equipment from Workers, either directly or through employment or recruitment agencies. It was evidenced there was no case of any payment withheld or requested.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's recruitment procedures do not allow to require Migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's recruitment procedures do not allow holding Workers in Debt Bondage or force them to work in order to pay off a debt. It was evidenced there was no employee obligated to pay any debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's recruitment and Human Resources procedures do not allow restricting the freedom of movement of Workers in the workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's recruitment and Human Resources procedures do not allow retaining original copies of Workers' identity papers, work permits, travel documents or training certificates. It was evidenced there was no original copies of documentation belonging to the employee were kept.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity recruitment and Human Resources procedures do not allow denying Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity has included in its code of conduct a special chapter with the commitment to have a diverse workforce with special measures to ensure the non-discrimination at the workplace. A committee is also in place with Unions that holds regular meetings to review information about any possible discrimination and also as a place to denounce any situation against the code of conduct and the collective bargaining agreement. No discrimination was found during audits and interviews at the Entity's sites.
10.5 Communication and engagement	Conformance	The Entity has policies to ensure open communication and direct engagement with Workers and their representatives. It also has frequent Meetings established in Collective

CRITERION	RATING	COMMENT
		<p>Bargaining Agreement for the treatment of any labor issue. Workers can also go directly to Human Resources managers or through their union representatives to discuss any issue. Also, employees can make complaints in a confidential environment through the employee's channel.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has policies regarding Labor Conduct. Also applies as a reference the Statute of labor conduct of the Metal Sector also applies as a reference, as well as compliance with those established in the Collective Bargaining Agreement regarding the procedure of hearing before faults and sanctions. After interviews with managers, employees, works council and workers' representatives, no sanction or disciplinary measure is identified in accordance with the collective agreement and the legislation. No incidents of mental or physical punishment were detected at the Entity's sites</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has a collective bargaining agreement that includes a chapter for remuneration of the personnel. The conditions improve those established in the sector agreements (Metal Sector Agreement). The Entity's payments exceed the minimum salary limit established for Spain</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity makes monthly payment of wages. Workers receive documentation of their payroll receipt in accordance to the law. Payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details</p>
10.8 Working Time	Conformance	<p>The Entity establishes in collective bargaining agreement the number of annual hours to be carried out, the organization of vacations as well as the procedures for their request. Also includes the norm for compensation in the event of termination due to TA (temporary disability) or Work Accident, complementing the provisions of the legislation and improving the conditions established by law Monitoring of compliance with the legal limit of overtime of each worker is also carried out The Entity promotes the reconciliation of work and family life. Different shift models are in place for the Entity's sites. These are approved by Workers council and</p>

CRITERION	RATING	COMMENT
		local authorities. Public holidays and Annual leave are paid according to local law
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a code of conduct, approved by CEO. The Entity has a Health, Safety and Environment policy approved by Plant Manager. The code of conduct and the Health, Safety and Environment policy identify and evaluate the risks, the control thereof, the investigation of accidents and incidents and the development of the effectiveness of the Safety management system. It is appropriate to the magnitude and nature of the risks of the safety management system and includes a commitment to continuous improvement and the prevention of injuries and damages. It includes the commitment towards legal requirements. It provides a frame of reference for creating and reviewing the objectives of the health and safety management system.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has a Health, Safety and Environment policy approved by Plant Manager. It is known by all the people who work in the organization, both their own and collaborating companies, as well as visitors. The Health, Safety and Environment policy is published on the company website: https://aludium.com/es/care/politica-de-medio-ambiente-salud-y-seguridad/ and is part of the code of conduct published on the company website: https://aludium.com/es/aludium/mision-vision-valores/ The safety and health performance data is published in the sustainability report published on the company website: https://aludium.com/es/aludium/sostenibilidad/ (p.12-18) The conditions for contracts and suppliers are published on the website: https://aludium.com/es/aludium/estandares-para-los-provedores/
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has a Health, Safety and Environment policy approved by Plant Manager. It includes the commitment towards legal requirements.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has a Health, Safety and Environment policy approved by Plant Manager. It is appropriate to the magnitude and nature of the risks of the safety management system and includes a commitment to continuous improvement and the prevention of injuries and damages. It provides a frame of reference for creating and reviewing the objectives of the health and safety management system. It is documented on paper or by electronic means. It is known by all the people who work in the organization, both their own and collaborating companies, as well as visitors.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented Occupational Health and Safety Management System that is conformant with applicable national and international standards. The Entity also has a valid OHSAS 18001 certificate
11.3 Employee engagement on health and safety	Conformance	The Entity is following best industry practice on Occupational Health and Safety with close cooperation with management and the employees. The Entity Committees, Subcommittees in the Departments and parities are maintained. Minutes of all of them are recorded and action plans are determined. Workers can freely report risks. Follow-up is done. The Entity has a valid OHSAS 18001 certificate.
11.4 OH&S performance	Conformance	The Entity evaluate its Occupational Health and Safety performance regularly and several key performance indicators are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve. The Entity has Health & Safety indicators monitored at the follow-up meeting with the Lead Team. These are distributed to all Department Heads for deployment. Objectives are defined which are in the planning of the preventive activity, which is available to the Representatives of the workers. The KPIs also appear in the annual report of the Prevention Service and follow up on previous years to analyze the trend. Contractors working at Aludium's sites are bound by the same health and safety requirements as their own employees. All incidents with and without injury are investigated and action plan defined and implemented. In order to prevent serious

CRITERION	RATING	COMMENT
		<p>accidents, Aludium Amorebieta implemented the Fatality and Serious Injury – Prevention (FSI-P) initiative during 2018. FSI-P uses daily observations and risk evaluations to identify risks which could lead to serious injury or death. Once identified, the risk is managed by implementing preventive measures in a short period of time. The Health, Safety and Environment performance is published in Sustainability Report on the company web: https://s3-usa.s3.amazonaws.com/c/307591170/media/43845db045848cbe027733980941226/Sustainability%20Report%202018.pdf .(p.12-18)</p>