
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

BRIDGNORTH ALUMINIUM

CERTIFICATE
NUMBER

58

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

14 DECEMBER 2019

DATE OF EXPIRY

13 DECEMBER 2022

CERTIFIED SINCE

14 DECEMBER 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

*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

Activities undertaken at Bridgnorth Aluminium Ltd
(UK)

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Bridgnorth Aluminium
ENTITY NAME	Bridgnorth Aluminium Limited
CERTIFICATION SCOPE	Activities undertaken at Bridgnorth Aluminium Ltd (UK)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Aluminium Re-melting/Refining• Semi-Fabrication• Material Conversion• Other manufacturing or sale of products containing Aluminium
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	28 – 30 October 2019
AUDIT REPORT SUBMISSION	3 December 2019
AUDIT SCOPE	<p>Activities undertaken at Bridgnorth Aluminium Ltd. currently include those to manufacture Lithographic plates, foil, transformer windings and formable aluminium strips/coils for automotive heat and sound absorbing components</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Aluminium Re-melting/Refining• Semi-Fabrication• Material Conversion• Other manufacturing or sale of products containing Aluminium <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>

AUDIT
OUTCOME

- 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.
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CERTIFICATION
PERIOD

14 December 2019 – 13 December 2022

NEXT AUDIT
TYPE

Re-Certification

NEXT AUDIT
DUE DATE

13 December 2022

CERTIFICATE
NUMBER

58

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity subscribes to proprietary legal update service, uses its own subject matter experts and their networks and has a legal register and training systems in place to maintain awareness of and ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has a Code of Conduct which covers Anti-bribery, financial integrity, conflicts of interest, donations and sponsorship and gift and entertainment policy available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility . It works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility , which includes principles relevant to environmental, social and governance performance. All employees are trained in the Code.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity implements and maintains a combined 'Operating Policy Statement' and 'Code of Conduct' available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility , which is consistent with the environmental, social and governance practices included in this Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity senior management have endorsed the Operating Policy Statement. which is regularly reviewed and supported through provision of adequate resources.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its Policies expectations to employees, contractors and suppliers using training, proprietary systems and communications. The Code of Conduct and reporting on this is available at:

CRITERION	RATING	COMMENT
		https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
2.2 Leadership	Conformance	<p>The Entity has nominated the Sustainability Manager as the senior Management Representative having overall responsibility and authority for ensuring conformance with this Standard. This is endorsed by the CEO.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity operates a certified Environmental Management System within an Integrated Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented)</p> <p>https://www.bridgnorthaluminium.co.uk/home. Its most recent surveillance audit completed through report issued on 25th Oct 2019.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has systems in place to manage labour and human rights as evidenced by electronic and paper based human resources systems and meeting records reviewed on site.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues and has controls in place to evaluate risks in supply chain, suppliers and to monitor progress as evidenced in its Code of Conduct, procedures and other documentation. It has a code of conduct available on the website https://www.bridgnorthaluminium.co.uk/home with a version of this document provided to all suppliers.</p>
2.5 Impact Assessments	Conformance	<p>The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new capital expenditure projects and this would cover any major changes to existing facilities. This was evidenced by the documented capital expenditure review process. The site has not had any major projects for a number of years, which would be subject to Strategy Environmental assessments and Environmental Impact Assessments.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has a site specific emergency response team (ERT) plan developed in collaboration with workers and their</p>

CRITERION	RATING	COMMENT
		representatives, and relevant agencies, which is a requirement of its Combined Management System Certificate issued by Lloyds Register #10125957 covering ISO 14001, ISO 9001 and OHSAS 18001 valid until 12th March 2021.
2.7 Mergers and Acquisitions	Conformance	The Viohalco Group which owns Bridgnorth Aluminium (BAL) has a procedure in place that defines due diligence process for mergers and acquisitions and that covers environmental, social and governance issues. There has been no mergers or acquisitions at BAL.
2.8 Closure, Decommissioning and Divestment	Conformance	The Viohalco Group which owns Bridgnorth Aluminium (BAL) has a procedure in place that defines the process for closure, decommissioning and divestment and that covers environmental, social and governance issues. There has been no significant closure, decommissioning and divestment at BAL.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. See https://www.bridgnorthaluminium.co.uk/news and https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
3.2 Non-compliance and liabilities	Conformance	The Entity has processes in place to publicly disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. It has not had any regulatory breaches in recent years.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has only made payments to governments on a legal and/or contractual basis as evidenced by the most recent set of reports and accounts and the Code of Conduct. Both are available on the website https://www.bridgnorthaluminium.co.uk/information/5a4b45143ac1b/Reports-Financials and https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has a Combined Management System Certificate issued by Lloyds Register #10125957 covering ISO 14001, ISO 9001 and OHSAS 18001 valid until 12th March 2021, which requires a complaints resolution mechanism is in place that is accessible, transparent, understandable and culturally and gender sensitive, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. Initial contact point for any complaint is via the details on the Entity's home page: https://www.bridgnorthaluminium.co.uk/home
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 Litho and Foil and will make the LCA report available to customers on request
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity can provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s) for Litho and Foil which represents most of its business by turnover.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity can provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s) for Litho and Foil which represents its main products. the LCA's contain full details of underlying assumptions and system boundaries. Public information, if requested can provide this context to the LCA's.
4.2 Product design	Conformance	The Entity has a research and development process which considers sustainability impacts and contains objectives to enhance sustainability in the design and development process for products, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimizes the generation of Aluminium Process Scrap within its own operations and collects 100% of process scrap for re-use within its process. No scrap Aluminium leaves the site.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys and grades for recycling as evidenced by the scrap

CRITERION	RATING	COMMENT
		management process and plans as well as site observation.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, with some broad objectives focused on engagement with customers and users via industry bodies to encourage recycling of all Aluminium. Its main Litho products do enter the recycling system as they are highly valuable and easy to collect from the final end users - printers. Other products also enter recycling systems to a large degree.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with national and international industry and collection and recycling systems to support accurate measurement and efforts to increase recycling rates for Aluminium. This was evidenced through the recycling strategy and photographs of the company at events.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses material GHG emissions and energy uses by main sources on an annual basis. See p14 of its Sustainability report 2018 for information: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets. See p14 of its Sustainability report 2018 for information: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility . It implements a plan to achieve these targets. The targets cover the material sources of Direct and Indirect GHG Emissions and is being developed to include Scope 3 sources over time. The Entity buys 100% certified renewable electricity and imports electricity from a local farm based biogester produced energy provider.
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.

CRITERION	RATING	COMMENT
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	The Entity quantifies and reports Emissions to Air that have adverse effects on humans or the environment and implements plans to minimise these adverse impacts as evidenced by the documentation reviewed, management testimonial and observation.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports Discharges to Water and assesses potential adverse effects on humans or the environment, and has plans in place to minimise these adverse impacts as evidenced by discharge consents and permitting requirements confirmed by the local Environment Agency.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted assessments of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil and has management plans in place as evidenced through its Emergency Response Team Manual and risk assessment documentation.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	the Entity has a management, internal and external communication plan, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage as evidenced by the Emergency Response Team Manual.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has the procedures in place to disclose to affected parties the volume, type and potential impact of significant Spills immediately after an incident. It has not had reportable spills in recent years confirmed by incident logs.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses any reportable events and impact assessments of the spills and remediation actions taken on an annual basis. There have been none reported in last 3 years.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy and action plans to achieve it as evidence by documentation and site observation.

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6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods. See page 16 of Bridgnorth's 2018 Sustainability Report below: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity seeks to maximise the recovery of Aluminium by treatment of Dross and Dross residues as evidenced through process documentation review, observation and documentation from their dross suppliers
6.8b Dross (recycling)	Conformance	The Entity seeks to maximise the recycling of treated Dross residues as is evidenced by

CRITERION	RATING	COMMENT
		supplier records, documented procedures on site and observation.
6.8c Dross (review of alternatives)	Not Applicable	The Entity recovers 100% of its dross which is sent for recovery and recycling to 2 suppliers. It does not landfill any dross.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water withdrawal and use by mains source and sub-meters. It draws all its water from the mains as evidenced by invoices and water balance documentation.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks in Watersheds in the Entity's Area of Influence as evidenced by its risk assessment as part of its environmental management systems certification.
7.2a Water management (management plans)	Conformance	The Entity has a water management plan, that addresses material risks identified in criterion 7.1(b) and provides targets for improvement. This is evidenced by the plan and risk assessments.
7.2b Water management (monitoring)	Conformance	The Entity has plans in place to monitor the effectiveness of the Water Management plans as evidenced through the Management systems review meeting schedule.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports water withdrawal and use and discloses material water-related risks as evidenced by its Sustainability Report 2018, page 15: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
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 the Entity's Area of Influence, which includes the immediate surrounding land, some broadleaved woodland and hedgerows, its airshed and local influence on the watershed of the Severn River (~465m away) as evidenced by its Preliminary Ecological Assessment. There are no associated facilities related to the site and its location in an industrial estate on the

CRITERION	RATING	COMMENT
		edge of a small town means that transport impacts relate to the established road network. Report stated minimal risk with no material impact.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has implemented a Biodiversity Action Plan, which was reviewed, with time-bound targets to address material impacts identified through criterion 8.1 and is monitoring its effectiveness.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed in consultation with local experts and is designed in accordance with the Biodiversity Mitigation Hierarchy as evidenced by document review and local stakeholder interview.
8.2c Biodiversity management (reporting)	Conformance	The achieved biodiversity outcomes are shared with stakeholders and made publicly available through the company's newsletter and sustainability report (https://www.bridgnorthaluminium.co.uk/news) and is periodically updated.
8.3 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity as evidenced by its biodiversity assessment and management plan.
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 Code of Conduct relating to the respect of Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances:

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		(https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility)
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented 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. This was evidenced by a range of documents and processes observed on site and is commensurate with the size and scale of the operation and its risk environment. The biggest risks relate to its supply chain which is covered by its processes.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has processes to understand any potential human rights impacts, to remediate them through legitimate processes. This was evidenced through its whistleblowing and complaints mechanism and a process to resolve disputes.
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). It seeks greater participation of women in the workplace. This was evidenced by its code of conduct, policies and gender pay reporting.
9.3 Indigenous Peoples	Not Applicable	No indigenous peoples present in area. Code of Conduct commits to human rights.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	No indigenous peoples present in area. Code of Conduct commits to human rights.
9.5 Cultural and sacred heritage	Conformance	The Entity consults with local Communities and has cooperatively identified that it does not negatively impact on cultural heritage sites in the region.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement was needed for site and there are no expansion plans.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement was needed for site and there are no expansion plans.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural

CRITERION	RATING	COMMENT
		resources. This was evidenced through stakeholder interviews with local community members.
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. This was evidenced by its management practices on site, its complaint mechanisms and processes.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with local Communities opportunities to respect and support their livelihoods and plays a key role in Bridgnorth as the town's second largest employer. This was evidenced by stakeholder interviews and documentation.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has processes in place to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The risk is in procurement of metals used in the alloying process, which is well managed through risk assessments of suppliers.
9.9 Security practice	Conformance	The Entity employs private security providers, and requires them to respect Human Rights in line with recognised standards and good practices. Supplier has been sent Supplier code of conduct which requires respect of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, in line with the ILO Conventions C87 and C98 as evidenced by UK law and union representation on site.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collective bargaining, participate in any collective bargaining process in good faith to the extent possible under Applicable Law and adhere to collective bargaining agreements where such agreements exist. This was evidenced by collective bargaining document and through interviews with Union representatives.

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10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity allows freedom of association and collective bargaining, in line with UK law.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use nor support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law. This was evidenced through Code of Conduct, worker interviews and observation.
10.2b Child Labour (hazardous)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law and its young workers are subject to risk assessment and are not engaging in Hazardous activities. This was evidenced through Code of Conduct, worker interviews and observation.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182, and shall comply with related national and international law including not engaging in or supporting the Worst Forms of Child Labour. This was evidenced through Code of Conduct, risk assessments of apprentice young workers, worker interviews and observation.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in or support Human Trafficking as per its Code of Conduct and does not use recruitment agencies. This was evidenced through Code of Conduct, risk assessments of suppliers, anti-slavery statement available on its website (https://www.bridgnorthaluminium.co.uk/home)
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers and does not use recruitment agencies. This was evidenced through Human Resource records and the Code of Conduct.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29

CRITERION	RATING	COMMENT
		(2014) to this Convention, and C105 and does not employ Migrant Workers. This was evidenced through Human Resource records, Worker and Management interviews.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. This was evidenced through the Code of Conduct, Worker and management interviews and Observations on site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not retain original copies of Workers' identity papers, work permits or travel documents as evidenced through human resources records viewed on site. It provides access to worker training certificates and training records, confirmed on site through worker interview.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length. This was evidenced through worker interview and leaving process documentation.
10.4 Non-Discrimination	Conformance	The Entity has provisions in place to ensure equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation,

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		marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, in line with ILO Conventions C100 and C111.
10.5 Communication and engagement	Conformance	The Entity ensures 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. This was evidenced through worker interviews, policy and documentation.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. This was evidenced through the review of processes and case records while on site.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income. This was evidenced through review of payroll records and worker interviews.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments that are timely, in legal tender and fully documented. This was evidenced through payroll records and worker interviews.
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. This was evidenced through review of timesheet and payroll data and worker interviews.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented) https://www.bridgnorthaluminium.co.uk/home . Its most recent surveillance audit was completed on 25th Oct 2019. The Entity Implements, communicates and regularly reviews an

CRITERION	RATING	COMMENT
		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 Operational Statement (the Policy) to all Workers and Visitors present in any area or activities under the Entity's control. The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented) https://www.bridgnorthaluminium.co.uk/home . Its most recent surveillance audit was completed on 25th Oct 2019.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has included in its operational statement (the Policy) a commitment to comply with Applicable Law on Workers' health and safety and international standards. The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented) https://www.bridgnorthaluminium.co.uk/home . Its most recent surveillance audit was completed on 25th Oct 2019.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has included in the Statement of Intent and the Charter that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented) https://www.bridgnorthaluminium.co.uk/home . Its most recent surveillance audit was completed on 25th Oct 2019.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System, within a combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented). Its most recent surveillance audit completed through report issued on 25th Oct 2019. The system is conformant with applicable national and international standards and certified to OHSAS 18001.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	<p>The Entity provides Workers with a mechanism by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented)</p> <p>https://www.bridgnorthaluminium.co.uk/home.</p> <p>Its most recent surveillance audit was completed on 25th Oct 2019.</p>
11.4 OH&S performance	Conformance	<p>The Entity evaluates its Occupational Health and Safety performance using leading and lagging indicators, compares this with peers and best practices where available, and strives to continuously improve. The Entity operates a certified Combined Management System Certificate 10125957 valid until 12th March 2021 (when ISO 45001 has to be implemented)</p> <p>https://www.bridgnorthaluminium.co.uk/home.</p> <p>Its most recent surveillance audit was completed on 25th Oct 2019.</p>