

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

JUPITER ALUMINUM CORPORATION

CERTIFICATE
NUMBER

61

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

7 JANUARY 2020

DATE OF EXPIRY

6 JANUARY 2023

CERTIFIED SINCE

7 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a light green 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

Jupiter Aluminum operations located in Hammond, IN USA. At the Hammond Facility Jupiter re-melts scrap aluminum to produce new coils which are further processed to customer specifications. Besides the re-melt operation in Hammond, coils are cold rolled, annealed, finished and packaged for shipment to customers.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Jupiter Aluminum Corporation
ENTITY NAME	Jupiter Aluminum Corp.
CERTIFICATION SCOPE	Jupiter Aluminum operations located in Hammond, IN USA. At the Hammond Facility Jupiter re-melts scrap aluminum to produce new coils which are further processed to customer specifications. Besides the re-melt operation in Hammond, coils are cold rolled, annealed, finished and packaged for shipment to customers.
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	November 19, 2019 - November 20, 2019
AUDIT SCOPE	Jupiter Aluminum operations located in Hammond, IN USA. All relevant criteria in the ASI Performance Standard were included in the audit scope.
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 7 January 2020 to 6 January 2023

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 7 July 2021

CERTIFICATION NUMBER 61

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Jupiter Aluminum has systems in place to maintain awareness of and ensure compliance with Applicable Law. They have identified a company responsible for legal requirements and have identified responsible personnel for each department. Jupiter also has agreements with many law firms to provide them with regular updates on changes in regulatory requirements.
1.2 Anti-Corruption	Conformance	The Governance framework documents prohibition of bribery in all business practices and transactions, and the whistle blower policy. The governance framework policy has been communicated to employees through employee training and employees have signed training attendance.
1.3 Code of Conduct	Conformance	Jupiter has implemented the Code of Conduct Policy document that includes principles relevant to environmental, social and governance performance. The employees have been trained on the code of conduct. The document is a controlled document, and has been reviewed and approved by management. Jupiter has maintained Training log and signed training attendance sheets that evidence the training.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy	Conformance	Jupiter has developed a series of policies that demonstrate its commitment to the environmental, social and governance practices included in the ASI standard. These policies are available at available at https://www.jupitaluminum.com/Main/Responsibility , under the headings Environmental Management System, Social Management System, and Governance Framework.
2.1b Environmental, Social, and Governance Policy	Conformance	Jupiter's policies (available at https://www.jupitaluminum.com/Main/Responsibility , under the headings Environmental Management System, Social Management System, and Governance Framework) define management sponsors who are responsible for the implementation & maintenance of each policy. All policies are reviewed by senior management, and formally approved by the President.
2.1c Environmental, Social, and Governance Policy	Conformance	Jupiter effectively communicates its policies to both internal and external stakeholders. Policies are available to internal and external stakeholders via Jupiter's website (https://www.jupitaluminum.com/Main/Responsibility , under the headings Environmental Management System, Social Management System and Governance Framework). In addition, internal stakeholders receive training on all policies.

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2.2 Leadership	Conformance	According to the Jupiter EMS (available at https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf), Jupiter's EHS Director is responsible for ensuring the ASI social, environmental and governance requirements are reflected in the entity's management system. In addition to the EHS Director, Jupiter has sponsored an internal environmental management committee to support the further development of the management system.
2.3a Environmental and Social Management Systems	Conformance	Jupiter has defined and is implementing an Environmental Management System designed to identify and mitigate environmental risks. the system is defined in the Jupiter Aluminum Environmental Management System document, available at https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf
2.3b Environmental and Social Management Systems	Conformance	Jupiter has developed, and is implementing, a social management system (available here: https://www.jupitaluminum.com/assets/images/about/JAC_Social.pdf) to identify and mitigate the impact of its operations on stakeholders. The management system is overseen by the Human Resources Director, and is reviewed annually by senior management.
2.4 Responsible Sourcing	Conformance	Jupiter's Governance Framework (available at https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf) includes a responsible sourcing policy that covers supplier requirements for environmental, governance, and social standards. Vendors are required to sign purchase orders & the company code of conduct, which are available on the Jupiter website (https://www.jupitaluminum.com/Main/Responsibility , under the headings Global Code of Conduct, and Terms and Conditions of Purchases). These documents define vendor social, environmental and governance practices.
2.5 Impact Assessments	Conformance	Since joining ASI Jupiter Aluminum has not undertaken any projects related to expansion or significant changes to operations at its Hammond location. Jupiter's policies require it to conduct all necessary impact assessments for new projects or major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	Jupiter's Emergency Action Plan includes evacuation procedures and communication protocols for various types of emergencies, and defines training and record keeping requirements. The emergency action plan was developed to meet regulatory requirements, which were developed with input from stakeholders. However, Jupiter's location in an

CRITERION	RATING	COMMENT
		industrial area limits external stakeholder exposure to emergency situations, and so compliance with regulatory requirements is sufficient to address consultation with external stakeholders.
2.7 Mergers and Acquisitions	Conformance	JACs governance framework (see https://www.jupiteraluminum.com/assets/images/about/JAC_Governance.pdf) requires that it engage with outside specialists to perform environmental, social and fiscal due diligence on a merger or acquisition target. They have gone through one M&A in 20 years, which closed Dec 5, 2018. This happened before the governance framework policy was in place, but Jupiter did contract with an environmental consultant (RAMBL) and a local law firm, for due diligence purposes.
2.8 Closure, Decommissioning and Divestment	Conformance	Jupiter's Governance Framework (available at https://www.jupiteraluminum.com/assets/images/about/JAC_Governance.pdf) procedures require that it follows all legal requirements to mitigate potential health, social and environmental impacts in the event of a site closure or decommissioning event, including following Indiana Department of Environmental Management (IDEM) guidelines and the DOL Worker Adjustment and Retraining Notification Act. According to interviews with senior management, Jupiter has had no closures/decommissionings in 27 years of operation.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	According to the ASI standard, the entity must disclose its material environmental, social and economic impacts. The Sustainability information presented online (available under the Sustainability Information heading at https://www.jupiteraluminum.com/Main/Responsibility) includes environmental impacts, but does not discuss social or economic impacts. These should be included in future sustainability reporting to ensure compliance with the standard.
3.2 Non-compliance and liabilities	Conformance	Information on Jupiter's significant fines, judgments, penalties and non-monetary sanctions are available through public databases, including: OSHA - https://www.osha.gov/pls/imis/establishment.html IDEM - https://www.in.gov/idem/5157.htm (Public Records Request Form) EPA - https://echo.epa.gov/facilities/facility-search
3.3a Payments to governments	Conformance	Jupiter has the required policies, training and oversight to ensure that payments made to governments are only on a legal/contractual basis. JACs governance framework establishes a zero-tolerance position on bribery and

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		corruption. The framework outlines what is and is not acceptable for vendor gifts, facilitation payments, political contributions and charitable contributions, and establishes regular auditing requirements and responsibilities.
3.3b Payments to governments	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	JAC has developed, and is effectively implementing, a grievance mechanism that is appropriate for its operations. The mechanism is described in the collective bargaining agreement and the employee handbook, while external stakeholders can utilize regulatory agency hotlines to file complaints. For instance, they may contact the City of Hammond's Department of Environmental Management (at 219-853-6306) or the Cities Code Enforcement Division (at 219-853-6447).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	Jupiter has provided internal production data to the American Aluminum Association in order to create a comprehensive analysis of its emissions, waste, water, and energy impacts. The first LCA analysis was published in 2013, and the second edition will be available by the end of 2019. The LCA developed by the Aluminum Association is from cradle to gate.
4.1b Environmental Life Cycle Assessment	Conformance	The LCA is available online and the link to the LCA has been provided in the Environmental Management System Document. The LCA developed by the Aluminum Association is from cradle to gate.
4.1c Environmental Life Cycle Assessment	Conformance	The LCA is available online and the link to the LCA has been provided in the Environmental Management System Document. The LCA is a very detailed report and includes the underlying assumptions including system boundaries.
4.2 Product design	Not Applicable	Jupiter Aluminum does not create consumer/commercial goods nor does it play a role in designing said goods for customer needs. When opportunity arises, when customer requests for a change in the material, and does not provide specific material specifications, Jupiter provides the client with their input on how they can improve their material.
4.3a Aluminium Process Scrap	Conformance	The scrap produced internally by Jupiter Aluminum at the site is used as raw material. Jupiter reuses 100% of the scrap that is produced internally. Jupiter Aluminum manufactures coils using 97% recycled aluminum scrap and 3% primary aluminum.

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap	Conformance	Jupiter reuses 100% of the scrap that is produced internally. Jupiter Aluminum manufactures coils using 97% recycled aluminum scrap and 3% primary aluminum. All input material is managed based on its alloy, grade and other characteristics to suit the operations.
4.4a Collection and recycling of products at end-of-life	Conformance	Jupiter's strategy is to source much of its scrap through third-party scrap brokers (suppliers) to increase scrap collection from products at end of life. These suppliers work closely with scrap generators, including customers of Jupiter, to provide the physical equipment needed to sort, store and transport scrap that is at the end of its useful life.
4.4b Collection and recycling of products at end-of-life	Conformance	Jupiter is a member the American Aluminum Association, and is involved in providing input to the end clients and the aluminum community on recyclability of the product. Aluminum association provides support and information to its members to drive increases in aluminium recycling rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	Interviews with the EHS Director and Sustainability Specialist suggested that propane and diesel fuel are consumed on-site (in forklifts). This fuel consumption should be reported in Scope 1 emissions (see Suggested Business Improvement)
5.2 GHG emissions reductions	Conformance	Jupiter has committed to a 10% reduction from its 2015 baseline by 2025. This commitment is publicly available at https://www.jupiteraluminum.com/assets/images/about/JAC_Sustainability.pdf (page 1-2)
5.3a Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting	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	Jupiter has systems to quantify and report Emissions to Air that have adverse effects on humans or the environment and are included as requirements in the permit issued by Indiana Department of Environmental Management. Compliance with the permit includes requirements to implement plans to minimize these adverse impacts by, among other things, periodic emissions testing, monitoring and maintenance programs. Jupiter has documented that such plans exist and that the company has procedures in place to supervise, monitor and continuously measure emissions to air. Jupiter is

CRITERION	RATING	COMMENT
		regulated for and monitors Criteria Pollutants such as PM10, PM 2.5 and VOC.
6.2 Discharges to Water	Conformance	Jupiter Hammond has implemented systems to quantify and monitor water effluents to publicly owned treatment works (POTW)/sewage treatment plant that have adverse effects on humans or the environment and are included as requirements in the permit issued by Sanitary District of Hammond Indiana. The permit includes requirements to implement plans to minimize these adverse impacts such pre-treatment standards and Jupiter has documented that such plans exist and that the company has procedures in place to demonstrate compliance.
6.3a Assessment and Management of Spills and Leakage	Conformance	Jupiter Aluminum has developed a spill prevention control and countermeasure plan. The plan is developed to meet the USEPA regulations contained in 40 CFR Part 112 – Oil Pollution Prevention. The major risk area identified is the Oil storage and the plan is developed accordingly.
6.3b Assessment and Management of Spills and Leakage	Conformance	<p>Jupiter Aluminum has developed a spill prevention control and countermeasure plan. The plan is developed to meet the USEPA regulations contained in 40 CFR Part 112 – Oil Pollution Prevention.</p> <p>The document has the below required information:</p> <ul style="list-style-type: none"> Inventory of materials that can leak and spill Systems and controls for detecting and monitoring spills and leakages Documented management plans with controls to prevent occurrence of, and to mitigate impacts associated with, spills and leakages Procedures for communicating spills and leakages to affected personal and external stakeholders
6.4a Reporting of Spills	Conformance	<p>The spill prevention control and countermeasure plan includes:</p> <ul style="list-style-type: none"> - Procedures with documented methodology for determining the Jupiter's volume, type and potential impact of significant Spills - Procedure for immediate reporting and communication of Jupiter's volume, type and potential impact of significant Spills to affected personnel and external stakeholders
6.4b Reporting of Spills	Conformance	There has been no spills in the last five years. If there is a spill in future, in accordance with the SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN a spill notification form will be completed and submitted to the regulatory authorities.

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6.5a Waste management and reporting	Minor Non-Conformance	Jupiter Aluminum does not have a documented Waste Management Strategy. Jupiter will need to provide evidence that 1) the Strategy focuses on key risks and impacts associated with waste streams 2) the Strategy is designed in accordance with the Waste Mitigation Hierarchy
6.5b Waste management and reporting	Conformance	Jupiter publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods. https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf (pg 2)
6.6a Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross	Conformance	Jupiter does not send any of its Dross to landfill. Jupiter recovers a small percentage of aluminum. The Dross is sent to Sceptor and Smelter Services to further recover aluminum from dross. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter.

CRITERION	RATING	COMMENT
6.8b Dross	Conformance	Jupiter does not send any of its Dross Residue to landfill. Jupiter recovers a small percentage of aluminum. The Dross Residue is sent to Sceptor and Smelter Services to further recover aluminum from dross residue. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter.
6.8c Dross	Conformance	Jupiter does not send any of its Dross to landfill. Jupiter recovers a small percentage of aluminum. The Dross is sent to Sceptor and Smelter Services to further recover aluminum from dross. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment	Conformance	Jupiter's water use information data report gives a summary of Jupiter's Water intake, use and discharge. All of Jupiter's water supply is sourced by the Hammond Waterworks Department, which has the sole authority to withdraw from Lake Michigan. All discharge is through a single sewer, where Jupiter pays for all treatment needs. Jupiter's Water use presents no risk to the water shed or water quality.
7.1b Water assessment	Conformance	<p>Jupiter's Area of influence includes the industrial park on which it presides, and its immediate air shed and water shed (Valparaiso Moraine of the Lake Michigan Watershed). All water related discharges are directed and treated through the Hammond sanitary district.</p> <p>Interviews with Jupiter staff determined that Jupiter has assessed its water-related risks. All of Jupiter's water supply is sourced by the Hammond Waterworks Department, and all water is discharged and treated through 1 sewer. Jupiter has therefore concluded that their water use presents no risk to the water shed or water quality.</p>
7.2a Water management	Minor Non-Conformance	The ASI Standard requires the entity to implement water management plans, with time-bound targets that address material risks identified in criterion 7.1(b). Jupiter Aluminum's management system does not address this requirement. While the risks have been identified as low by Jupiter, the management system must still address the requirement.
7.2b Water management	Minor Non-Conformance	The ASI Standard requires the entity to monitor the effectiveness of its water management plans. Jupiter Aluminum's management system does not define a water management plan, and therefore it is not monitored. While the risks have been identified as low by Jupiter, the management system must still address the requirement.
7.3 Disclosure of water usage and risks	Conformance	Jupiter provides a public report (available at https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf (pg 2) Lack of Water related risks are

CRITERION	RATING	COMMENT
		discussed on pg 15 of the Biodiversity Risk Assessment (see evidence).) detailing its water withdrawal and use
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Jupiter Aluminum has conducted a biodiversity risk assessment that assesses the risk and materiality of the impacts on biodiversity from its operations. The assessment profiles endangered flora/fauna within 2 miles of the facility, and confirms that there are no key biodiversity areas (according to the Integrated Assessment Tool) within 5 miles of the facility. There are IUNC Management, Category V protected areas within 2 miles of the facility.
8.2a Biodiversity management	Conformance	Jupiter has conducted a Biodiversity Risk Assessment, which found that no further management system or action plan is required to mitigate adverse impacts on biodiversity, due to JAC's small area of influence, the relative lack of biodiversity in the area, and the high level of regulatory controls in place
8.2b Biodiversity management	Conformance	According to the Biodiversity Risk Assessment, no further management system or action plan is required to mitigate adverse impacts on biodiversity, due to JAC's small area of influence, the relative lack of biodiversity in the area, and the high level of regulatory controls in place.
8.2c Biodiversity management	Conformance	Jupiter Aluminum has conducted a biodiversity risk assessment, and has made the results publicly available on its website https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf (pg 2)
8.3 Alien Species	Conformance	Jupiter has assessed the risks of introducing alien species through its operations, and is taking steps to mitigate potential risks, including: - utilizing contractors that are implementing proper housekeeping & maintenance, and - completing routine inspections of wood pallets, to ensure they are not carrying alien species.
8.4a Commitment to "No Go" in World Heritage properties	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5b Mine rehabilitation	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence	Conformance	The Social and Ethical Management Standards include the Policy commitment to respect Human Rights. The Policy makes reference to the UN Guiding Principles. The Policy has been communicated to the employees through a formal training.
9.1b Human Rights Due Diligence	Conformance	Jupiter has conducted a detailed Human Rights Due Diligence - The HR Director and the Sustainability Manager conducted the due diligence. Input from management and employees was taken to conduct the due diligence. The due diligence process is the first steps towards identifying potential impacts on Human Rights. Based on the risk level assigned to the identified criteria's prevention and mitigation plans are developed. Jupiter demonstrated procedures and policies in place in order to respect Human Rights and according to the UN Guiding Principles on Business and Human Rights. This is part of the Jupiter's Code of Conduct applicable to all employees, as well as suppliers and partner companies.
9.1c Human Rights Due Diligence	Conformance	Jupiter has not caused or contributed to adverse Human Rights impacts. Jupiter demonstrated procedures and policies in place in order to respect Human Rights and according to the UN Guiding Principles on Business and Human Rights. This is part of the Jupiter's Code of Conduct applicable to all employees, as well as suppliers and partner companies. Jupiter has a grievance reporting mechanism to report any complaints including human rights violation.
9.2 Women's Rights	Conformance	The Jupiter Aluminum Social and Ethical Management Standard has a combined human and women's right policy. The policy is in lines with, but not limited to United Nations Guiding Principles on Business and Human Rights - The UN Convention on the Elimination of all Forms of Discrimination Against Women, 1979.
9.3 Indigenous Peoples	Conformance	Jupiter has demonstrated that there are no Indigenous Peoples in the Hammond area. However, The Social and Ethical Management Standard includes the Policy on Indigenous Peoples Rights. It further states that Jupiter aims to abide by recommendations put in place by: Indiana Native American Indian Affairs Commission (INAIAC), The American Declaration on the Rights of Indigenous Peoples, and US Agency for International Development (USAID)

CRITERION	RATING	COMMENT
		regarding Free and Prior Informed Consent, Resettlement standards, and cultural and sacred heritage.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	Jupiter has demonstrated that there are no areas of governance by indigenous peoples and local communities near or around the Jupiter Facility.
9.5 Cultural and sacred heritage	Conformance	There are no cultural and heritage sites within Northwestern Indiana.
9.6a Resettlements	Conformance	The Jupiter facility is located in an industrial area since inception and there has been no resettlement required in the located site.
9.6b Resettlements	Conformance	The Jupiter facility is located in an industrial area since inception and there has been no resettlement required in the located site.
9.7a Local Communities	Not Applicable	The Jupiter facility is located in an industrial area, and there are no nearby rural or residential communities. There are no communities whose livelihoods and use of natural resources is affected by Jupiter.
9.7b Local Communities	Not Applicable	The Jupiter facility is located in an industrial area, and there are no nearby rural or residential communities. There are no communities whose livelihoods and use of natural resources is affected by Jupiter.
9.7c Local Communities	Not Applicable	The Jupiter facility is located in an industrial area, and there are no nearby rural or residential communities. There are no communities whose livelihoods and use of natural resources is affected by Jupiter.
9.8 Conflict-Affected and High-Risk Areas	Conformance	Jupiter Hammond is located in US and does not operate in high conflict zones. Jupiter has a conflict minerals policy posted on its website, and its application is used to ensure it does not contribute to armed conflict or human rights abuses in conflict affected areas.
9.9 Security practice	Not Applicable	Jupiter has no security check for employees and no security personnel on site.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining	Conformance	The Social and Ethical management standards includes a policy on rights of Workers to associate freely in Labor Unions in lines with the ILO Conventions C87 and C98. The employee handbook is provided to all employees as part of the training, which includes these policies and procedures.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining	Conformance	Jupiter Aluminum respects the rights of Workers to collective bargaining, they participate in the collective bargaining process and adhere to collective bargaining agreements
10.1c Freedom of Association and Right to Collective Bargaining	Not Applicable	Jupiter does not operate in countries where collective bargaining agreement is not legal.
10.2a Child Labour	Conformance	Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.
10.2b Child Labour	Conformance	Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.
10.2c Child Labour	Conformance	Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.
10.3a Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies.
10.3b Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies. Jupiter does not require any form of deposit, recruitment fee or equipment advance from Workers.
10.3c Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies. Jupiter does not hire any migrant workers and does not require any deposits at the time of hiring.
10.3d Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly

CRITERION	RATING	COMMENT
		and does not use any employment agencies. Jupiter does not hire any migrant workers and does not require any deposits at the time of hiring.
10.3e Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter has no restriction on movement of workers in the facility.
10.3f Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter does not retain any original documents of employees including identity papers and training certificates.
10.3g Forced Labour	Conformance	Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter employees are allowed to terminate their employment at will, they are requested to provide a two weeks notice.
10.4 Non-Discrimination	Conformance	Jupiter has a Non-Discrimination Policy in the Social and Ethical Management Standards which is in lines in line with ILO Conventions C100 and C111. The Policy covers race, color, origin, gender, sexual orientation, pregnancies, age, disability, religion, genetic information, marital status, family responsibilities and political or union affiliation.
10.5 Communication and engagement	Conformance	Jupiter Social and Ethical Management Standard has the required policies on freedom of association and communication. The Jupiter Hammond facility workers have a collective bargaining agreement that provides procedures that state Jupiter's approach to communication, consultation and engagement with workers, procedures and templates for the resolution of workplace issues and compensation without threat of reprisal and procedures for fair treatment and disciplinary processes.
10.6 Disciplinary practices	Conformance	The disciplinary procedure is documented in the employee handbook and collective bargaining agreement. Jupiter does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. Jupiter has a mature grievance reporting, tracking and handling process.
10.7a Remuneration	Conformance	The workers are paid above the minimum legal wage in Indiana. The collective bargaining agreement reflects the pay

CRITERION	RATING	COMMENT
		grade and wage based on roles. Overtime is voluntary and paid 1.5 times the regular wage.
10.7b Remuneration	Conformance	The review of pay slips and time sheets confirm that salary is paid in a timeline manner and correctly.
10.8 Working Time	Conformance	The collective bargaining agreement and the employment handbook details the working hours, sick days, vacation and overtime details. This was further verified against the payroll records. The Working hours is in compliance with the local law and is communicated to all employees.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy	Conformance	Jupiter has developed and effectively implements/maintains an Occupational Health and Safety Policy supported by senior management. The policy includes training requirements, applicable to all workers, as well as auditing requirements to track implementation of the standard. The policy has been reviewed by senior management, and the President has given final approval of the document.
11.1b Occupational Health and Safety (OH&S) Policy	Conformance	Jupiter's OH&S policy states that it is applicable to "Jupiter, its employees, vendors and out-side contractors". Staff are effectively trained on the policy, while the Jupiter Aluminum visitor safety notice defines required PPE, and rules of conduct for all visitors.
11.1c Occupational Health and Safety (OH&S) Policy	Conformance	The Employee Handbook and the OH&S policy state that Jupiter, it's employees, vendors and out-side contractors will comply with all OSHA requirements, while the Global Code of Conduct states that "Jupiter must comply with United States Federal and State Laws, as well as the International Labor Organization guidelines regarding workplace rights"
11.1d Occupational Health and Safety (OH&S) Policy	Conformance	The OH&S management system defines an employee's right to refuse dangerous work, and prevents retaliation against individuals who report safety violations. The policy requires regular workplace audits, to identify and address potential behavioral and physical hazards. Training requirements are defined, and records of trainings were reviewed to demonstrate effective implementation the requirements. Hourly workers confirmed that they felt comfortable refusing unsafe work, though no workers every thought they or their colleagues were asked to do unsafe work. Jupiter's policies provide Workers the ability to identify hazards and safe practices for their work, and the authority to refuse or stop unsafe work

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Employee Handbook & OH&S policy state that Jupiter, it's employees, vendors and out-side contractors will comply with all OSHA requirements, while the Global Code of Conduct states that "Jupiter must comply with United States Federal and State Laws, as well as the International Labor Organization guidelines regarding workplace rights". Jupiter has developed an Occupational Health and Safety Management System that meets applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	Jupiter's CBA establishes a Plant Safety Committee consisting of union and non-union employees through which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. During interviews, workers indicated that they were looking forward to joining the committee, and felt it was an effective forum to raise/address worker concerns. Workers further felt comfortable raising issues to their supervisors, and felt that these issues would be addressed by senior management.
11.4 OH&S performance	Minor Non-Conformance	According to the ASI Standard, the entity shall "compare this with peers and best practices where available". Jupiter has not taken steps to benchmark their performance against industry peers.