
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NORÐURÁL – CENTURY ALUMINUM COMPANY

CERTIFICATE
NUMBER

66

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

10 JANUARY 2020

DATE OF EXPIRY

9 JANUARY 2023

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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

Production of aluminium and aluminium alloy
ingots.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Norðurál . Century Aluminum Company
ENTITY NAME	Norðurál Grundartangi
CERTIFICATION SCOPE	Production of aluminium and aluminium alloy ingots
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
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	August 26, 2019 - August 28, 2019
AUDIT SCOPE	Production of aluminium and aluminium alloy ingots
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	10 January 2020 to 9 January 2023
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT
DATE

10 July 2021

CERTIFICATION
NUMBER

66

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with applicable law. This includes the use of external consultant that provide advisory service to the Entity about its applicable laws.
1.2 Anti-Corruption	Conformance	The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. An Anti-corruption policy is in place and annually signed by management and specialists. The policy is available on the web: https://centuryaluminum.gcs-web.com/static-files/3720e6c8-ad00-4af8-a090-6ffe227a7bdd
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct practice through their Mission, Vision and Values statement. The Mission, Vision and Values includes principles relevant to environmental, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance policies.
2.1b Environmental, Social, and Governance Policy	Conformance	The policies and procedures are reviewed and updated on a regular basis. All policies have senior management approval and are regularly reviewed and updated in the Management Review.
2.1c Environmental, Social, and Governance Policy	Conformance	The Entity is communicating the Environmental, Social, and Governance Policies internally, and externally as appropriate. Internally on the company intranet, in the management system and on display boards. Externally the policies are provided upon request and the environmental policy is available on the web: https://nordural.is/en/environment-and-society/ The health and safety rules and policy practice for contractors is available on the web: https://nordural.is/wp-content/uploads/2018/02/NA_Oryggisreglur_EN.pdf The entity could consider to communicate the policies related to health/safety/Human Rights on their web site in the same way as the environmental policy.
2.2 Leadership	Conformance	The Entity has nominated the Safety and Environmental Manager as having overall responsibility and authority for

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		ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems	Conformance	The Entity has documented and implemented an environmental management System and is ISO 14001:2015 certified.
2.3b Environmental and Social Management Systems	Minor Non-Conformance	The Entity has documented and implemented a social management system integrated with quality, environmental and safety management Systems. A non-conformance was raised due to accomplishment of the planned internal audits of the social management system.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity seeks to ensure responsible sourcing but has not established, implemented and communicated to suppliers a responsible sourcing policy covering environmental, social and governance issues. Safety and environmental issues in the approval- and evaluation process of suppliers can be documented.
2.5 Impact Assessments	Not Applicable	The Entity has not executed any major projects or changes to existing facilities during the last years. The Entity has procedures in place to conduct environmental, health and safety impact assessments when performing major changes and capital investments. An improvement suggestion have been raised to include requirements and tools related to impact assessment when it comes to social, cultural and Human Rights issues when performing major changes or investments.
2.6 Emergency Response Plan	Conformance	The Entity has emergency response and evacuation plans developed in collaboration with potentially affected stakeholder groups such as communities, workers and their representatives, and relevant agencies.
2.7 Mergers and Acquisitions	Conformance	No merger and acquisition have been done in the past 5-10 years. The Entity will review environmental, social and governance issues in the Due Diligence process if mergers and acquisitions occurs.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. This is in compliance with local laws.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The reporting is accessible for instance through the entity web pages:

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		<p>https://nordural.is/en/environment-and-society/ https://nordural.is/graentbokhald2018/en/</p> <p>The auditor suggest to improve even more a transparent sustainability report covering both environmental and social topics and focus. The annual report 2018 should be publicly accessible through the company web page.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable law through their mother company financial annual reporting. https://centuryaluminum.gcs-web.com/static-files/4cc082bb-7071-4ef8-8472-881712d05bc8 page 20 and 75</p> <p>Also, in the environmental reporting, the Entity is disclosing information on complying with applicable laws. https://nordural.is/graentbokhald2018/en/#14</p>
3.3a Payments to governments	Conformance	<p>The Entity has not made, or on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the financial annual report. The entity management have committed to follow all applicable laws and ethical principles. The conclusion is confirmed by the financial auditor. https://nordural.is/graentbokhald2018/en/#14</p>
3.3b Payments to governments	Not Applicable	<p>This criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has implemented Complaints Resolution Mechanisms procedures, adequate to address stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>The procedure for this is not accessible for external stakeholders, it is within the entity internal management system. Externally, contact information is available on the entity main web. www.nordural.is and the use of the email account nordural@nordural.is</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity publicly disclose Environmental impact studies and a green accounting report which is independently verified by auditors. The entity need to finalize and evaluate life cycle impacts of its major product lines.</p>
4.1b Environmental Life Cycle Assessment	Conformance	<p>Upon customer request, the Entity will provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products. Different studies have been performed and it could be even more improved a transparent and easy access to stakeholders about cradle</p>

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		to gate life cycle assessments and carbon footprint information.
4.1c Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity is currently not publishing Environmental Life cycle assessments on product level publicly. Life cycle assessment is not fully finalized thus underlying assumptions are not yet available.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap	Conformance	The Entity has established strategies minimizing process scrap. Targets on reducing waste and scrap supporting a circular economy thinking are well established. All process scarp is recirculated on site and the production system gives the needed structure and traceability for separating aluminium alloys and grades for recycling.
4.3b Aluminium Process Scrap	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. All process scrap is recirculated on site and the production system gives the needed structure and traceability for separating aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life	Minor Non-Conformance	As a member of Samal, the aluminum producersq association in Iceland and the European Aluminium association the Entity is involved and engaged in local, regional and national activities promoting collecting and recycling systems to increase recycling rates. The Entity need to document their recycling strategy with timelines, activities and targets for products at end of life.
4.4b Collection and recycling of products at end-of-life	Conformance	The Entity promotes end-of-life recycling through local and national activities. As a member of Samal, the aluminum producersq association in Iceland, the Entity is involved and engaged in local, regional and national activities promoting collecting and recycling systems to increase recycling rates. http://www.samal.is/is/
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity discloses GHG emissions and energy use in their annual green accounting report https://nordural.is/graentbokhald2018/en/#7 https://nordural.is/graentbokhald2018/en/#8 The public disclosure of GHG emissions and energy use is not fully reported by source.

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5.2 GHG emissions reductions	Minor Non-Conformance	Norðurál's climate action plan is not covering the material sources of GHG emissions. The climate action plan is not publicly disclosed.
5.3a Aluminium Smelting	Conformance	The Entity has an environmental management system in place ensuring operation controls to limit direct GHG emissions.
5.3b Aluminium Smelting	Conformance	The Entity can demonstrate average direct and indirect emissions is far below the 8 tonnes CO ₂ -eq per metric tonnes Aluminium target.
5.3c Aluminium Smelting	Not Applicable	The Entity has no plans for 2020 or later on starting up new production capacity at Norðurál.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has systems and procedures to report on emissions to air to national authorities and internally. Plans are in place to minimize the impact of emission to air. The performance is presented in the annual report available on the web. https://nordural.is/graentbokhald2018/en/#7 https://nordural.is/graentbokhald2018/en/#8
6.2 Discharges to Water	Conformance	The Entity has systems and procedures to report on emissions discharges to water national authorities and internally. Plans are in place to minimize the impact of discharge to water. The performance is presented in the annual report available on the web. https://nordural.is/graentbokhald2018/en/#8
6.3a Assessment and Management of Spills and Leakage	Conformance	The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects, potential spills and leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage	Conformance	The Entity has a management and external communication plan, compliance controls and a monitoring programme in place to prevent and detect spills and leakage. The entity is ISO 14001 certified and operation procedures and preventive maintenance ensure control and reduction of potential risks identified. The emergency organisation, including rescue staff, is trained regularly. Management and external communication plans are implemented.
6.4a Reporting of Spills	Conformance	The Entity has systems to report and communicate to affected parties about potential impacts of significant

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		spills. Emergency response plans are established and regularly reviewed and tested.
6.4b Reporting of Spills	Conformance	The Entity has systems and a reporting culture in place to address and disclose potential significant spills on an annual basis in their Green accounting report. https://nordural.is/graentbokhald2018/en/#6
6.5a Waste management and reporting	Conformance	The Entity has a waste management strategy focusing on waste mitigation, recycling and reuse. In the Operational permit it is clearly stated how to manage waste. It is accessible on Icelandic Environmental Agency's webpage. Waste disposal is on page 9 in the Operation permit.
6.5b Waste management and reporting	Conformance	The Entity publicly disclose the waste generation and disposals in the annual report. https://nordural.is/graentbokhald2018/en/#8
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)	Minor Non-Conformance	Due to flood pit disposal practice of Spent Pot Line (SPL) the Entity is not fully in compliance with the requirement to prevent leachate to the environment. Flood pit is so far, the best practice for treating SPL in Iceland, and complies with the operational license approved by the Icelandic Environmental Agency.
6.7b Spent Pot Lining (SPL)	Minor Non-Conformance	The Entity is not in compliance with the requirement to optimise processes for recovery and recycling carbon and refractory material from SPL due to flood pit disposal practise of untreated SPL. Flood pit disposal practise of SPL is in compliance with operation license.

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6.7c Spent Pot Lining (SPL)	Not Applicable	The Entity is not landfilling untreated SPL but using a flood pit disposal method where the SPL is treated /mixed with shell sand to neutralize before placed in the flood pit.
6.7d Spent Pot Lining (SPL)	Conformance	The Entity review alternative options to flood pit disposal and methods coming up are evaluated and compared with the flood pit method.
6.7e Spent Pot Lining (SPL)	Minor Non-Conformance	Due to flood pit disposal practise of untreated SPL the Entity is not in compliance with the requirement not discharge SPL to marine or aquatic environments. The flood pit disposal practise of SPL is in compliance with operation license.
6.8a Dross	Conformance	The Entity is processing dross and the aluminium recovered is recycled in the plant casthouse.
6.8b Dross	Minor Non-Conformance	The residue from the Entity's dross treatment at the recycling company is treated / disposed in flood pit.
6.8c Dross	Not Applicable	The Entity is recovering aluminum from dross and no dross is landfilled. Dross residue from the dross treatment recycling company used is treated/disposed in flood pit.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment	Conformance	The Entity has mapped its water withdrawal and use by source and type. Freshwater is from a controlled water supply utility that has an operational licence from the Health Authority. The fresh and seawater usage is monitored and reported in the Nordural Green Accounting report. https://nordural.is/graentbokhald2018/en/#8
7.1b Water assessment	Conformance	The Entity is assessing water-related risks related to operational, internal and external risk in their area of influence. There are no identified material water related risks since there is an abundance of water in the region of Iceland. The water used by the entity is flowing from the mountains to the sea. The Environmental impact assessment, required by law in Iceland, was done prior to building the facility. That covers water related risks and biodiversity risks for the industrial area where the plant is located, including the ocean and local fjord Hvalfjörður, and harbour.
7.2a Water management	Not Applicable	No material water related risks have been identified since there is an abundance of water in the region of Iceland. The water used by the entity is flowing from the mountains to the sea.

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7.2b Water management	Not Applicable	No material water related risks have been identified since there is an abundance of water in the region of Iceland. The water used by the entity is flowing from the mountains to the sea.
7.3 Disclosure of water usage and risks	Conformance	The Entity disclosure water withdrawal and use in their Green Accounting report. There are no water related risk identified for the Entity, since there is an abundance of water in the region of Iceland. The water used by the entity is flowing from the mountains to the sea. https://nordural.is/graentbokhald2018/en/#8
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. The biodiversity mitigation hierarchy is implemented in the methodology used. A yearly environmental monitoring programme in the area where entity is located is utilised by companies in the same region. The environmental monitoring is carried out according to an environmental monitoring plan 2018-2028. Its purpose is to assess the environmental impact of activities in the industrial area. Measurements of air quality, fresh water, the environment of seawater pits, hay, vegetation and grasses are performed. The monitoring program is based on a biodiversity risk mapping including both land use and activities in area of influence. The Environmental impact assessment, required by law in Iceland, was done prior to building the facility. That covers water related risks and biodiversity risks for the industrial area where the plant is located, including for example the ocean and local fjord Hvalfjörður, and harbour.
8.2a Biodiversity management	Conformance	The biodiversity action plans are designed in accordance with biodiversity challenges and showing where to monitor, what to monitor and when and how often, built on risk identification from environmental impact.
8.2b Biodiversity management	Conformance	The Entity has a biodiversity action plan that is consultative and designed in accordance with the biodiversity mitigation hierarchy. An environmental monitoring is carried out according to the environmental monitoring plan 2018-2028. Its purpose is to assess the environmental impact of activities in the industrial area. Measurements of air quality, fresh water, the environment of seawater pits, hay, vegetation and grasses are performed. The monitoring program is based on a biodiversity risk mapping including both land use and activities in area of influence. There are open discussions with local neighbours on

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		issues relating to biodiversity (neighbourhood dialogue meetings where also the environmental national authority participate).
8.2c Biodiversity management	Conformance	The Entity is reporting on biodiversity issues to stakeholders in the annual report: https://nordural.is/wp-content/uploads/2019/05/2018Umhverfissv%c3%b6ktun.pdf (page 1516)
8.3 Alien Species	Conformance	The Entity has implemented procedure and trained personnel to proactively prevent accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. This is in compliance with Icelandic law no. 60/2013 on Wildlife Conservation, including the import of 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.
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 Entity has developed, implemented and communicated a Human Rights Policy expressing a commitment to respect Human rights. This is communicated through an equality policy emphasizes the equal rights of employees to careers, wages and rights, regardless of gender, sexual orientation, religion or origin.
9.1b Human Rights Due Diligence	Minor Non-Conformance	The Entity respects Human Rights and are continuously observing Human Rights related issues and are responding to it The Entity has not developed a due diligence process that also covers potential Human rights impact assessment in a broader view and in its area of influence.
9.1c Human Rights Due Diligence	Conformance	The Entity complies with National law on human rights. No breaches of Human Rights is reported to be followed up.
9.2 Women's Rights	Conformance	The Entity has implemented an equal right and equal pay policy. A local regulation is implemented about equal rights for women and men, including Equal Pay.

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9.3 Indigenous Peoples	Not Applicable	This requirement is not applicable for the certification scope where the entity operates. There are no Indigenous Peoples present.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This requirement is not applicable for the certification scope where the entity operates. There are no Indigenous Peoples present.
9.5 Cultural and sacred heritage	Not Applicable	It is not identified sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements	Conformance	The Entity is situated on land that is defined as industrial site. No activities related to resettlements is applicable in the certification period.
9.6b Resettlements	Not Applicable	The Entity is situated on land that is defined as industrial site and no residential area is close to the site. No activities related to resettlements is applicable in the certification period.
9.7a Local Communities	Conformance	<p>The Entity demonstrate respect to legal and customary rights and interests of local communities. A special focus on Environmental Monitoring in the surroundings is established and also regularly community open meetings is being arranged. The environmental monitoring report is of special interest for the local community and is presented in a yearly meeting: https://nordural.is/wp-content/uploads/2019/05/2018-Umhverfisvöktun.pdf</p> <p>The program "All Aboard" is an extensive Health and Safety program involving all staff members aims to improve company safety culture and increase awareness of key safety issues. This is important since a huge part of the company employees and suppliers have their livelihood in the local community nearby the plant: https://nordural.is/graentbokhald2018/en/#19</p> <p>Every year the Entity supports various kinds of community projects. Applications for a community grant could be submitted: https://nordural.is/article/large-and-small-community-projects/</p>
9.7b Local Communities	Conformance	<p>The Entity participate in a yearly Environmental Monitoring program covering the local community and the impacts. The results is published and a yearly open community meeting is arranged to discuss the findings. https://nordural.is/wp-content/uploads/2019/05/2018-Umhverfisv%c3%b6ktun.pdf</p>
9.7c Local Communities	Conformance	The Entity demonstrate respect to legal and customary rights and interests of local communities. A special focus

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		<p>on Environmental Monitoring in the surroundings is established and also regularly community open meetings is being arranged</p> <p>https://nordural.is/wp-content/uploads/2019/05/2018-Umhverfisvöktun.pdf</p> <p>https://nordural.is/graentbokhald2018/en/#19</p> <p>https://nordural.is/article/large-and-small-community-projects/</p> <p>The Entity supports different activities with local community for example primary sponsor for the local soccer team and a major soccer tournament for 6-7 year old kids, among other things.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not contributing to armed conflict or human rights abuses in their area of influence.
9.9 Security practice	Conformance	The Entity only hires security providers that are generally accepted in the community and respect human rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining	Conformance	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There are 5 unions that bargaining and make a written agreement with the Entity management. The agreement is valid for 5 years and is regularly followed up and discussed.
10.1b Freedom of Association and Right to Collective Bargaining	Conformance	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There are 5 unions that bargaining and make a written agreement with the Entity management. The agreement is valid for 5 years and is regularly followed up and discussed.
10.1c Freedom of Association and Right to Collective Bargaining	Not Applicable	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There is no need of alternative means in this respect.
10.2a Child Labour	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in the Workplace, including Child Labour, and the European Convention on Human Rights.
10.2b Child Labour	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in the Workplace, including Child Labour, and the European Convention on Human Rights.
10.2c Child Labour	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in

CRITERION	RATING	COMMENT
		the Workplace, including Child Labour, and the European Convention on Human Rights.
10.3a Forced Labour	Conformance	The local regulation restricts forced labor and Human Trafficking. No episodes or suspicion on Human Trafficking were observed during the audits at site.
10.3b Forced Labour	Conformance	No incidents were found at the entity site. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour	Conformance	No incidents were found at the entity sites. No migrant workers are hired.
10.3d Forced Labour	Conformance	No incidents were found at the entity sites.
10.3e Forced Labour	Conformance	No incidents were found at the entity sites. Workers are free to leave their working places.
10.3f Forced Labour	Conformance	No original identity papers are kept by the entity.
10.3g Forced Labour	Conformance	Conditions of termination of working contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	No discrimination was found during audits and interviews at the entity's sites. The Entity has developed and implemented an Equality policy addressing zero tolerance to discrimination.
10.5 Communication and engagement	Conformance	Workers unions have regular meetings with Management representatives to discuss the collective agreement and issues that arising.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the entity's sites. The entity has implemented policies dealing with harassments and bullying. An information brochure is developed and distributed to all employees.
10.7a Remuneration	Conformance	The Entity pays wages according to agreements with appropriate Labor Unions. The workers interviewed expressed satisfactory about the wages paid by the entity.
10.7b Remuneration	Conformance	Payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details.
10.8 Working Time	Conformance	Different shift models are in place in Entity. These are approved by collective agreements and local authorities. The Entity follows very closely and have good systems in place to watch overtime use. Public holidays and Annual leave are paid according to local law.

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PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy	Conformance	The Entity has developed, implemented and communicated a Health and Safety Policy endorsed and supported by senior management through provision of resources. The Entity is ISO 45001 certified and the Management demonstrate very strong commitment related to Health and Safety.
11.1b Occupational Health and Safety (OH&S) Policy	Conformance	The Entity Policy on Health and Safety is communicated in several ways. For instance, visually on boards and through training and contracts with external stakeholders. A Health and Safety program, called "All on Board", includes all employees, contractors and visitors.
11.1c Occupational Health and Safety (OH&S) Policy	Conformance	The Entity Policy on Health and Safety addresses the importance that safe work always is the most important and a commitment to comply with all Applicable Laws.
11.1d Occupational Health and Safety (OH&S) Policy	Conformance	The Entity Policy on Health and Safety addresses the importance that safe work always is the most important and Safety program, called "All on Board", supports the important work on building a strong safety culture. In this, stop working if not safe, is a pre-requisite.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented an Occupational Health and Safety Management System that is conformant with applicable national and international standards. The Entity is ISO 45001 certified.
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 "All on Board" Program is a good example of this with strong focus on building safety and feedback culture.
11.4 OH&S performance	Conformance	The Entity evaluate its Occupational Health and Safety performance regularly and several kpis are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve.