### ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# NOVELIS

CERTIFICATE NUMBER

50

ASI STANDARD

PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL

FULL CERTIFICATION

ASI ACCREDITED AUDITOR SZI GMBH

DATE OF ISSUE

**25 NOVEMBER 2019** 

DATE OF EXPIRY

24 NOVEMBER 2022

CERTIFIED SINCE

**25 NOVEMBER 2019** 

AUTHORISED BY

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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

The Novelis Ohle plant (Germany).

## SUMMARY AUDIT REPORT PERFORMANCE STANDARD

#### **OVERVIEW**

MEMBER NAME	Novelis
ENTITY NAME	Novelis Deutschland GmbH Werk Ohle
CERTIFICATION SCOPE	The Novelis Ohle plant (Germany).
SUPPLY CHAIN ACTIVITIES	Semi-Fabrication
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Certification Audit
AUDIT FIRM	SZI GmbH
AUDIT DATE	29 May 2019, 7 – 8 August 2019
AUDIT REPORT SUBMISSION	21 September 2019
AUDIT SCOPE	Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).
	Supply chain activities included in the audit scope:  Semi-Fabrication
	All relevant criteria in the ASI Performance Standard were included in the audit scope.
AUDIT OUTCOME	Certification

AUDIT METHODOLOGY	The Auditors confirm that:				
DECLARATION	The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.				
	☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.				
	The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.				
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.				
CERTIFICATION PERIOD	25 November 2019 – 24 November 2022				
NEXT AUDIT TYPE	Recertification Audit				
NEXT AUDIT DUE DATE	24 November 2022				
CERTIFICATE NUMBER	50				

### **SUMMARY OF FINDINGS**

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has implemented a thorough process to constantly maintain awareness of and ensure compliance with the latest applicable law.	
1.2 Anti-Corruption	Conformance	The topic of anti-corruption is regulated at the location Ohle. Group specifications are trained and implemented at all levels.	
1.3 Code of Conduct	Conformance	The Novelis Code of Conduct is implemented and trained. Suppliers must also comply with a special Code of Conduct: <a href="https://novelis.com/de/code-of-ethics/">https://novelis.com/de/code-of-ethics/</a>	
PRINCIPLE 2 POLICY & MANAGE	MENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Novelis Environment, Health, Quality, Safety (EHQS) policy is communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The external Kommuniktation via the webpage: (https://2gjjon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf)	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has approval and support from senior management in order to provide sufficient resources for the regular review of the EHSQ Policy. The ASI specific requirements should be also reviewed regularly.	
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Novelis EHQS policy is communicated both internal and external continuous. Internal communication is ensured through annual trainings and informational announcements. The external Kommuniktation via the webpage (https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf)	
2.2 Leadership	Conformance	The Entity has appointed and mandated a Senior Manager as Aluminium Stewardship Initiative (ASI) Manager.	

CRITERION	RATING	COMMENT	
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented a documented ISO 14001 Management system.	
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented and fulfils the requirements of a social Management System (SA 8000). Regular internal audits are carried out (annually).	
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues. The Entity has implemented a Code of conduct and a supplier declaration that covers environmental, social and governance issues. Main suppliers must provide a signed declaration and completed supplier self-declaration. Suppliers are regularly assessed.	
2.5 Impact Assessments	Conformance	As part of the internal risk assessments, the influencing factors such as environment, social, human rights are recorded and evaluated in the context of new projects and system changes. The results of the risk assessments do not currently require any necessary action. There were no major changes to the Ohle plant.	
2.6 Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency response plan. External stakeholders like community (Stadt Plettenberg) and authority are involved. There are regular trainings with the local fire fighters, the community and workers.	
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis headquarters are accompanied by a due diligence process and supported by external specialists to reflect environmental, social and governance issues.	
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented an adequate procedure for decommissioning. Details are regulated by German immission protection law and industrial property law.	
PRINCIPLE 3 TRANSPARENCY			
3.1 Sustainability Reporting	Conformance	There is an online published sustainability report (https://2gjjon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf )	

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity has implemented a legal register. There a several internal and external compliance audits. Legal deviations are published by the district government. <a href="https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen-5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf">https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen_5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with the strict local legislation and has implemented policies and procedures to conform to this requirement. To prevent corruption, detailed behaviours are described in the Novelis Code of Conduct. It is precisely regulated, for example, which payments are made to authorities.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity is certified ISO 14001:2015 and ISO 45001:2018 and has implemented fine complaints resolution mechanisms. A whistleblowing hotline is in place (NOVELIS ETHICS HOTLINE: 0800-180-6638)
PRINCIPLE 4 MATERIAL STEWAR	RDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life cycle assessments are implemented for standard and specialty products. The requirements of ISO 14040 are fulfilled.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity contributes life cycle inventory data to regional initiatives e.g. Aluminium Association and European Aluminium Sustainable Development Indicators. Life Cycle Assessments will be delivered to customers for their products by request (they are including the cradle to gate process).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA are available for the relevant products as well as for a standard product. Relevant data can be accessed via the European Aluminium SDI.  https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf
4.2 Product design	Conformance	When developing new products, the topic of sustainability and a new life cycle analysis are always carried out.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	A working scrap management is implemented. Aluminium process scrap should be reduced to a minimum, if scrap is generated it will be 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is a closed-loop production. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. The recycling strategy captures the product from the beginning to end of life
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for.  Novelis is actively engaged in European initiatives or groups that support and improve national collection rates.
PRINCIPLE 5 GREENHOUSE GAS	EMISSIONS	
5.1 Disclosure of GHG emissions and energy use	Minor Non- Conformance	The plant is not part of the International Greenhouse Gas Trade. EHS figures such as energy consumption, emissions, waste numbers and water consumption are visible in the publicly accessible entrance areas of the work over screens and posters.
		However, the energy use by source on an annual basis isn't publicly disclosed.
5.2 GHG emissions reductions	Conformance	Environmental activities reducing the energy consumption and in line the Greenhouse gas emissions (GHG) since years. GHG emissions KPI's and Targets you can find in the sustainability Report on page 7: <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT	
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE			
6.1 Emissions to Air	Conformance	Emissions to the air that have adverse effects on humans and the environment have under German law, reported and in line with the operation permit of Ohle plant. The emissions are controlled and reduced constantly.	
6.2 Discharges to Water	Conformance	Emissions to the water that have adverse effects on humans and the environment are under German law, reported and in line with the operation permit of the Ohle plant.	
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity performed risk assessments and implemented prevention measures on material leakages.	
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity performed risk assessments and implemented prevention measures on material leakages. Relevant spills are reported to the authority and by the Authority to all other relevant public interest parties (if necessary).	
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Reporting of spills is regulated, trained and tested. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2014.	
6.4b Reporting of Spills (regular reporting)	Conformance	The Reporting of spills is regulated, trained and tested. There are regular visits by the district government. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2014. <a href="https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf">https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf</a>	
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a waste management strategy. The goals in the field of Waste Management are fulfilled. A reduction of the waste streams is recognizable. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.	
6.5b Waste management and reporting (disclosure)	Minor Non- Conformance	The Authority may, if necessary, request the report of the waste officer. On request, the quantities of hazardous and non-hazardous waste will be made available to the public.  Regular monitoring by the district government verifies compliance with legal requirements:	

CRITERION	RATING	COMMENT
		https://www.bezreg- arnsberg.nrw.de/themen/u/umweltinspektionen_ 5/uib_mk/plettenberg/Novelis-Deutschland- GmbH -Plettenberg21 06 2017.pdf.  However, not all quantities of Hazardous and Non-Hazardous Waste generated by the Entity
		and associated Waste disposal method has been publicly disclosed annually.
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)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT	
PRINCIPLE 7 WATER STEWARDSHIP			
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to local regulations. An overview of the water entrances, the various consumers and the different wastewater flows are described and regularly reviewed.	
7.1b Water assessment (risk assessment)	Conformance	The Entity assessed its water-related risks and implemented prevention measures accordingly in their entire area of influence	
7.2a Water management (management plans)	Conformance	The Entity implemented water management plans with targets. There is an annual review.	
7.2b Water management (monitoring)	Conformance	A water management is implemented.  Consumption figures and specifications are regularly monitored and reviewed.	
7.3 Disclosure of water usage and risks	Conformance	The required water law approvals are available. The requirements of the Water Resources Act are met. Through regular inquiries of the district government, the requirements are checked. The relevant water withdrawals (consumption) and sources can be viewed via the information and screens displayed at the public entrance areas. <a href="https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen-5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf">https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen_5/uib_mk/plettenberg21_06_2017.pdf</a> <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2018/11/Novelis-2018-Sustainability-Report-Final-lowres.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2018/11/Novelis-2018-Sustainability-Report-Final-lowres.pdf</a>	
PRINCIPLE 8 BIODIVERSITY			
8.1 Biodiversity assessment	Conformance	Environment Risk assessments are carried out as part of approval procedures. The risk assessment covers the entire influence area of the Ohle Plant location including an assessment of biodiversity Impacts.	
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were no material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures.	

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were no material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures. Issues of biodiversity are also subject to any operating permit (BImSchG). Even though no material impact has been identified, actions were taken to prevent biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	Even though no material impact has been identified, regular reporting process during the annual Management review and the public report of the district government Arnsberg.  https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen_5/uib_mk/plettenberg/Novelis-Deutschland-GmbHPlettenberg21_06_2017.pdf
8.3 Alien Species	Conformance	The Entity takes preventive actions to prevent the introduction of alien species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has implemented policies with commitment to respect human rights
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a code of conduct including Human Rights aspects. As part of a risk assessment, the requirements of human rights within the sphere of influence of the Ohle plant were examined. The focus here is the Preventive Approach to identify legal issues in advance.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified any contributed adverse Human Rights impacts.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	The Entity has implemented policies and tools to ensure women's rights are respected at all time.
9.3 Indigenous Peoples	Not Applicable	There is no known indigenous people living near the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There is no known indigenous people living near the Entity.
9.5 Cultural and sacred heritage	Not Applicable	There is no known cultural or sacred heritage near the Entity.
9.6a Resettlements (avoid or minimise)	Conformance	An Entity's shareholder has implemented a procedure that covers impacts of any resettlements. As part of the future plans, no expansion of the production halls is planned on the existing site of Novelis in Ohle. Should the situation change, the requirements of the ASI Performance Standard will be considered as part of risk assessment.
9.6b Resettlements (where unavoidable)	Conformance	There is a procedure that covers impacts of any resettlements. Even though resettlements have very little chance to happen, the global directives from Novelis plans the decommissioning and the German legislation is very strict.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The location Ohle respects and is very sensitive to the neighbourhood, the community and all other interest groups in the vicinity of the work. An evaluation of the interested parties took place.
9.7b Local Communities (impacts)	Conformance	The Entity is preventing effectively any impact on the local communities.
9.7c Local Communities (livelihoods)	Conformance	The Entity has been part of numerous of social activities with the local communities as part of their normal general commitments.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has strict procedures to ensure it doesn't contribute in any way to Human Rights abuses in High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity mainly performs the security itself but also contracts an external security provider for gate control and plant security.

CRITERION	RATING	COMMENT	
PRINCIPLE 10 LABOUR RIGHTS			
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the local regulations on workers' rights and applies a collective agreement for the metallurgy sector. Most workers joined a trade union and there is an elected workers council.	
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the local regulations on workers' rights and applies a collective agreement for the metallurgy sector. Most workers joined a trade union and there is an elected workers council. No infringement to this requirement has ever been reported (e.g. Collective bargaining).	
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity only operates in Germany, a country that doesn't restricts workers' rights. The Entity respects the freedom of association without interference.	
10.2a Child Labour (minimum age)	Conformance	Entity's policies and local regulations are in place to avoid hire of child labour. The Entity has a strict control over any potential child labour.	
10.2b Child Labour (hazardous)	Conformance	Entity's policies and local regulations are in place to avoid hire of child labour. The Entity has a strict control over any potential child labour.	
10.2c Child Labour (worst forms)	Conformance	Entity's policies and local regulations are in place to avoid hire of child labour. The Entity has a strict control over any potential child labour.	
10.3a Forced Labour (human trafficking)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	
10.3b Forced Labour (deposits, fees, advances)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	
10.3c Forced Labour (migrant workers)	Conformance	Freedom of association and collective bargaining is not restricted in Germany. The Entity respects the freedom of association without interference.	
10.3d Forced Labour (debt bondage)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	

CRITERION	RATING	COMMENT	
10.3e Forced Labour (freedom of movement)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	
10.3g Forced Labour (freedom to terminate employment)	Conformance	Entity's policies and local regulations are in place to avoid forced labour. The Entity has a strict control over any potential forced labour.	
10.4 Non-Discrimination	Conformance	Entity's policies and local regulations are in place to avoid discrimination. The Entity has a strict control over any potential discrimination.	
10.5 Communication and engagement	Conformance	The Entity has implemented a Code of Conduct, and multiple independent complaints resolution procedures to ensure the compliance to that requirement. No infringement to this requirement has ever been reported.	
10.6 Disciplinary practices	Conformance	The Entity has implemented a Code of Conduct, plant regulations and internal verification systems to ensure Inadmissible behaviour at workplaces.	
10.7a Remuneration (living wage)	Conformance	The Entity has implemented clear policies and controls in place to ensure a fair remuneration.	
10.7b Remuneration (method of payment)	Conformance	The Entity has implemented clear policies and controls in place to ensure a fair remuneration.	
10.8 Working Time	Conformance	The Entity has implemented clear policies and controls in place to ensure working times.	
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY			
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	A health and safety policy (guidelines) is in place and published.	
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	A health and safety management system is implemented and working. The occupational health and safety policy applies to workers and visitors.	
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	A health and safety policy (guidelines) is in place and published. It is made accessible to all employees, visitors and suppliers (intranet / internet). The policy includes the obligation to comply with legal requirements.	

CRITERION	RATING	COMMENT
		https://2gjjon1sdeu33dnmvp1qwsdx- wpengine.netdna-ssl.com/wp- content/uploads/2015/12/2015-EHSQ-Policy- Guidelines-Nov-2015-ENG.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Employees are regularly briefed on the dangers at the workplace (based on the risk assessment). They have the right and obligation to report unsafe conditions and stop the work immediately if necessary.
11.2 OH&S Management System	Conformance	A health and safety management system is implemented and working.
11.3 Employee engagement on health and safety	Conformance	Employees are involved in the preparation of risk assessments. Through the safety officers they are also involved in the regular occupational health and safety committee (4 x year).
11.4 OH&S performance	Conformance	The continuous improvement of occupational health and safety performance is driven by performance indicators and the achievement of goals. Occupational safety committee meetings take place four times a year. There is a review of the numbers and the targets instead. Measures are discussed and coordinated there. The performance measures include lagging and leading indicator.