

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HYDRO ALUMINIUM PRIMARY METAL

CERTIFICATE
NUMBER

26

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

11 MAY 2019

DATE OF EXPIRY

10 MAY 2022

CERTIFIED SINCE

11 MAY 2019

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the authorised signatory of the Aluminium Stewardship Initiative Ltd.

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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

Hydro Aluminium Primary Metal including the smelting, re-melting/refining and casthouse activities at the production sites Azuqueca (Spain), Clervaux (Luxembourg), Commerce (USA), Deeside (UK), Henderson (USA), Luce (France), Rackwitz (Germany), Husnes (Norway), Høyanger (Norway), Karmøy (Norway), Sunndal (Norway) and Årdal (Norway) and Hydro Corporate Office (Norway). Production of extrusion ingot, slabs, wire rod and primary foundry alloys.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Aluminium Primary Metal
CERTIFICATION SCOPE	Hydro Aluminium Primary Metal including the smelting, re-melting/refining and casthouse activities at the production sites Azuqueca (Spain), Clervaux (Luxembourg), Commerce (USA), Deeside (UK), Henderson (USA), Luce (France), Rackwitz (Germany), Husnes (Norway), Høyanger (Norway), Karmøy (Norway), Sunndal (Norway) and Årdal (Norway) and Hydro Corporate Office (Norway). Production of extrusion ingot, slabs, wire rod and primary foundry alloys.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouseAluminium Re-melting/Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (12 October 2018 . 22 February 2019)Scope Change Audit (24 September 2019 . 12 December 2019)
AUDIT FIRM	DNV GL
AUDIT DATE	24 September 2019 . 12 December 2019
AUDIT REPORT SUBMISSION	11 March 2020
AUDIT SCOPE	<p><u>Initial Certification Audit (12 October 2018 . 22 February 2019)</u></p> <p>The audit scope covered Hydro Aluminium Primary Metal including the smelting, re-melting/refining and casthouse activities at the production sites Clervaux (Luxembourg), Høyanger (Norway), Karmøy (Norway), Sunndal (Norway) and Årdal (Norway) and Hydro Corporate Office (Norway).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouseAluminium Re-melting/Refining

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Scope Change Audit (24 September 2019 . 12 December 2019)

The audit scope covered Hydro Aluminium Primary Metal including the production sites at Azuqueca, Commerce, Deeside, Henderson, Husnes, Luce (Cathouse) and Rackwitz Cathouse.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Cathouse
- Aluminium Re-melting/Refining

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☒ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ☒ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☒ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

11 May 2019 . 10 May 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

10 May 2022

CERTIFICATE
NUMBER

26

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has systems in place to maintain awareness of and ensure compliance with applicable law. Primary Metal Business Area in Hydro Aluminium and the local sites have valid ISO 9001 (quality), ISO 14001 (environment) and ISO 45001 (occupational health and safety) certificates. Some sites have also valid ISO 50001 (energy management) certificates.</p> <p>https://www.hydro.com/en-NO/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. Anti-corruption policy and integrity program are in place and implemented in the organisation by training and compliance activities.</p> <p>https://www.hydro.com/en-NO/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/anti-corruption/</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct procedure including principles relevant to environmental, social and governance performance. Each manager is responsible for implementing the Code of Conduct in their team and there are formal processes to train each category of employee at a level that is relevant to them.</p> <p>Link to Hydro Code of Conduct: https://www.hydro.com/en-NO/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance policies.</p> <p>https://www.hydro.com/principles/</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedure have senior management approval.</p> <p>https://www.hydro.com/principles/</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity is communicating the policies internally, and externally as appropriate - on display boards for employees, on the company website, in the annual report and management system.</p> <p>www.hydro.com/principles/</p>
2.2 Leadership	Conformance	<p>Hydro Corporate Management Board has nominated a senior management representative to have overall responsibility and authority for ensuring conformance with the requirements of ASI.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented integrated environmental and social management systems and is ISO 14001 and ISO 45001 certified.</p> <p>https://www.hydro.com/principles/</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented integrated environmental and social management systems and is ISO 14001 and ISO 18001 certified.</p> <p>https://www.hydro.com/principles/</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a responsible sourcing policy covering environmental, social and governance issues.</p> <p>https://www.hydro.com/globalassets/04-sustainability/hydro-supplier-code-of-conduct.pdf/</p>
2.5 Impact Assessments	Conformance	<p>The Entity has conducted environmental, social, cultural and human rights impact assessments, including a gender analysis, for new projects or major changes to existing facilities.</p> <p>https://www.hydro.com/en/investors/reports-and-presentations/annual-reports/annual-report-2018/</p>

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has site specific emergency response 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	The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed in the Capital Value Process.
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.
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 GRI Index reporting: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable law through their annual reporting. https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the annual report accessible on: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
3.3b Payments to governments (disclosure . bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through:

CRITERION	RATING	COMMENT
		https://www.hydro.com/en/contact-us/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used. For instance, through life cycle assessment (LCA) studies performed by independent institutions or case by case with customer interactions and needs.</p> <p>Link to 2015 Life Cycle Inventory Data and Environmental Metrics (2018) via the International Aluminium Institute website: http://www.world-aluminium.org/publications/</p> <p>Link to the LCA report from European Aluminium: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</p> <p>Other documents: https://www.hydro.com/en/products-and-services/low-carbon-aluminium/</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity publicly communicates LCA information through international studies and is a key contributor with analysis and data in this respect.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity publicly communicates LCA information through international studies available on the web.</p> <p>Link to 2015 Life Cycle Inventory Data and Environmental Metrics (2018) via the International Aluminium Institute website: http://www.world-aluminium.org/publications/</p> <p>Link to the LCA report from European Aluminium: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</p>
4.2 Product design	Not Applicable	<p>This criterion is not applicable to the Entity's certification scope.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has established strategies minimizing process scrap. Targets on reducing waste and scrap supporting a circular economy thinking are well established.</p>

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established good systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate aluminium as a building block for the low-carbon circular economy, continues to reduce its environmental footprint and has targeted increasing recycling of post-consumer scrap.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaging in different recycling initiatives and increasing capacity to process post-consumer scrap. The production of Hydro Circal (75% post-consumer recycling content) claim is a good example of this.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses greenhouse (GHG) emissions and energy use in their environmental reporting as part of the annual report. https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
5.2 GHG emissions reductions	Conformance	The Entity has an ambitious target and strategy to be carbon neutral by 2020. Different roadmaps, projects and initiatives supports this strategy. https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
5.3a Aluminium Smelting (management system)	Conformance	The Entity has a comprehensive management system to control and limit GHG emissions. Energy management system is certified against ISO 50001. Improvement programs are in place and an ambitious strategy to be carbon neutral by 2020.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity can demonstrate that average direct and indirect emissions from each smelter within the scope is well below 8 tonnes CO ₂ -eq per metric ton Aluminium. https://www.hydro.com/en/products-and-services/low-carbon-aluminium/
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity has no plans to start up Aluminium Smelters after 2020 where the emissions from production is above 8 tonnes CO ₂ -eq per metric tonne Aluminium.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has good systems and procedures to report on emissions to air to local authorities and internally to group level. The aggregated performance is presented in the annual report available on the web: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
6.2 Discharges to Water	Conformance	The Entity has good systems and procedures to report on discharges to water to local authorities and internally to group level. The aggregated performance is presented in the annual report available on the web: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
6.3a Assessment and Management of Spills and Leakage (assessment)	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 (management)	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.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has systems to report and communicate to affected parties about potential impacts of significant spills. Emergency response plans are established and regularly reviewed and tested.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management strategy focusing on waste mitigation, recycling and reuse. Several projects and investment on recycling and reuse are implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals in the annual report. https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
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)	Conformance	The Entity has established processes and barriers to handle SPL in a safe way to prevent leachate.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has a project and set target to optimise processes for recovery and recycling of carbon and refractory materials from SPL.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity can demonstrate good SPL management practise and no untreated SPL is sent to landfill where there is potential for adverse environmental effects.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has a waste strategy is to reduce waste to landfill. The SPL treatment process is reviewed annually, and project is established to optimise processes for recovery and recycling of carbon and refractory materials from SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's untreated SPL is stored indoors. No SPL is discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity is recovering Aluminium from dross with a corporate partner and nothing is landfilled
6.8b Dross (recycling)	Conformance	The Entity is recovering Aluminium from dross with a corporate partner and nothing is landfilled.
6.8c Dross (review of alternatives)	Conformance	The Entity is recovering Aluminium from dross with a corporate partner and nothing is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's sites have mapped their water withdrawal and use by source and type and

CRITERION	RATING	COMMENT
		assessing water related risks within their area of influence.
7.1b Water assessment (risk assessment)	Conformance	The Entity's sites have assessed risks related to operational, internal and external risk in their area of influence.
7.2a Water management (management plans)	Conformance	The Entity maps risks and implements a water management plan. From this targets and actions will be established.
7.2b Water management (monitoring)	Conformance	<p>The Entity is supporting the Sustainable Development Goals (SDG) and have identified Water Stewardship as a prioritized topic of their operation.</p> <p>https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity is reporting on water withdrawal and use, and their water related risks in the annual report.</p> <p>https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p> <p>At corporate level the Entity is supporting the Sustainable Development Goals (SDG) and have identified Water Stewardship as a prioritized topic of their operation.</p>
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.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has biodiversity action plans with time-bound targets in accordance with biodiversity risks.
8.2b Biodiversity management (consultation and mitigation hierarchy)	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 and the biodiversity mitigation hierarchy is implemented in the methodology used. The biodiversity action plans are designed in accordance with biodiversity challenges.
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity is reporting on biodiversity issues to stakeholders in the annual report.</p> <p>https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p>

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics such as biodiversity and 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 established a Human Rights Policy. https://www.hydro.com/Document/Index?name=Human%20Rights%20Policy.pdf&id=3007
9.1b Human Rights Due Diligence (process)	Conformance	The Entity shows good practice in this area, with an extensive human risk mapping on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas. https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity shows good practice in this area, with an extensive human risk mapping on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas. https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/
9.2 Women's Rights	Conformance	The Entity's code of conduct clearly states the equality between gender and is working to raise the share of women in the workforce. https://www.hydro.com/en-NO/sustainability/business-integrity-and-

CRITERION	RATING	COMMENT
		responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
9.3 Indigenous Peoples	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.5 Cultural and sacred heritage	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.7a Local Communities (rights and interests)	Conformance	The Entity's community engagement and CSR reporting guidelines demonstrate respect to legal and customary rights and interests of local communities.
9.7b Local Communities (impacts)	Conformance	<p>The Entity's Human Rights Impact Assessment clearly states that the Entity takes appropriate steps to prevent and address any adverse impact on local Community.</p> <p>Link to report via the website: https://www.humanrights.dk/news/mapping-human-rights-impacts-norsk-hydro</p>
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach of working with local communities and neighbourhood organizations to improve and support mutual interests.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This criterion is not applicable to the Entity's certification scope.
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report (page 101): https://www.hydro.com/en/investors/reports-and-presentations/annual-reports/annual-report-2017/
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a people directive procedure. In this procedure it clearly states the recognition of the principle of freedom of

CRITERION	RATING	COMMENT
		association and the right to join employee organizations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	For the sites in the Entity's certification scope, there is a freely elected workers council in place and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This requirement is not applicable for the certification scope where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	There's no employment of workers under age of 16 years. The Entity has established a People Directive procedure. In this procedure it clearly states that Hydro does not accept child labour and will not employ children below the age of 16.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 16. There's no employment of workers under age of 16 years old.
10.2c Child Labour (worst forms)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states that the Entity does not accept child labour and will not employ children below the age of 16. There's no employment of workers under age of 16 years old.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts forced labour. https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity's sites. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity's sites. No deposits are held, no recruitment fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity's sites. Workers are free to leave their working places.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	No original identity papers are kept by the Entity. Only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	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	The Entity has established a way of working that ensures non-discrimination and equal opportunities in the organisation.
10.5 Communication and engagement	Conformance	The Entity demonstrates open communication and direct involvement/engagement of workers and their representatives regarding working condition, resolution of workplace and compensation issues. Communication and engagement at the Entity are very strong and with engagement from employees. The Workers council have regular meetings with Management representatives and is part of Health and Safety Committees.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity's sites.
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented People Directive procedures. This clearly states a good remuneration practice. Living wages are paid at Entity's sites. Wages are defined by collective bargaining agreements and trade union wage tables.
10.7b Remuneration (method of payment)	Conformance	The Entity has established and implemented People Directive procedures. This clearly states a good remuneration practice. Payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details.
10.8 Working Time	Conformance	The Entity has established and implemented People Directive procedures. This clearly states a good Working Time practice. Different shift models are in place for the Entity's sites. These are approved by Workers council and local authorities for Sunday work within 4 . 6 shift model. Public holidays and Annual leave are paid according to local law and national standard.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a global health and safety policy owned by the president and CEO that is well implemented and supports health, safety and environment (HSE) risk reduction and awareness.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's policy on HSE is communicated in several ways. For instance, publicly on web or visually on boards and through training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's policy on HSE includes a commitment to comply with applicable law on workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's policy on HSE addresses rights of workers to refuse or stop unsafe work by the fact that "safe work is always the most important" and contains a commitment to comply with all applicable laws.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented occupational health and safety management system that is conformant with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity follows best industry practice on occupational health and safety with close cooperation with management and the employees.
11.4 OH&S performance	Conformance	The Entity evaluates its occupational health and safety performance regularly and several KPIs (key performance indicators) are addressed on occupational health and safety. The Entity has several tools for evaluating performance and continuously improve.

Document Control and Version History

Revision	Date	Notes
0	11 May 2019	Issued - Certification
1	18 March 2020	Updated to reflect Certification Scope change with addition of the production sites at Azuqueca, Commerce, Deeside, Henderson, Husnes, Luce (Casthouse) and Rackwitz Casthouse. Hyperlinks updated where required.