
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

STOCKACH ALUMINIUM GmbH

CERTIFICATE
NUMBER

69

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUT CERT
(AFNOR
GROUP)

DATE OF ISSUE

1 OCTOBER 2020

DATE OF EXPIRY

30 SEPTEMBER 2023

CERTIFIED SINCE

31 JANUARY 2020

AUTHORISED BY

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

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

Stockach Aluminium melts aluminium scrap into rolling ingots. It has the capacity to transform secondary aluminium with low as well as high impurities into high quality rolling slabs of a broad range of alloys. The Entity has only one site, in Stockach, Germany

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	StockachAlu
ENTITY NAME	Stockach Aluminium GmbH
CERTIFICATION SCOPE	Stockach Aluminium melts aluminium scrap into rolling ingots. It has the capacity to transform secondary aluminium with low as well as high impurities into high quality rolling slabs of a broad range of alloys. The Entity has only one site, in Stockach, Germany
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/Refining, Casthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Surveillance Audit
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">8 October 2019 . 9 October 2019 (First Certification Audit)23 July 2020 . 24 September 2020 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">17 December 2019 (First Certification Audit)10 September 2020 (Surveillance Audit)
AUDIT SCOPE	<p><u>First Certification Audit</u></p> <p>The Entity melts aluminium into ingots. It has the capacity to melt various alloys as well as secondary aluminium with high impurities but also primary aluminium. The Entity has only one site, in Stockach, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining, Casthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit</u></p> <p>The Entity melts aluminium into ingots. It has the capacity to melt various alloys as well as secondary aluminium with high impurities but also primary aluminium. The Entity has only one site, in Stockach, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p>

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- Aluminium Re-melting/Refining, Casthouses

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

1 October 2020 - 30 September 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

30 April 2022

CERTIFICATE
NUMBER

69

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes (including a legal register) which allow adequate awareness of legal requirements and which shall ensure compliance with Applicable Laws and regulations. Legal developments are systematically monitored and competent legal advice is available.
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms, consistent with Applicable Law and prevailing international Standards.</p> <p>The Entity has a System in place against corruption which is adequate to the size and nature of its business.</p> <p>Among the instruments, there is a Code of Conduct issued and communicated internally and externally.</p> <p>The company's Code of Conduct covering Business Ethics has been issued (available in local language) and can be downloaded from the Entity's website (see the following link: https://www.stockachalu.com/nachhaltigkeit/).</p> <p>The Entity has provided training to employees with regards to Business Ethics.</p> <p>The financial system is periodically audited by an external tax Auditor.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct and a supplier Code of Conduct including principles relevant to environmental, social and governance performance. These documents can be accessed via this link: https://www.stockachalu.com/nachhaltigkeit/.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has issued its Environment, Health & Safety Policy. Human and Labour rights are covered in its Code of Conduct. These documents have been adequately communicated internally (intranet, postings) and on the Entity's website: (https://www.stockachalu.com/nachhaltigkeit/).</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Policies are endorsed by senior management and will be periodically reviewed.</p> <p>Responsibilities are defined and adequate resources are provided.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	EHS-Policy and Code of Conduct are available in the Entity's Intranet and are accessible from the Entity's website: (https://www.stockachalu.com/nachhaltigkeit/). Employee training is ongoing.
2.2 Leadership	Conformance	One of the two Managing Directors and the Plant Manager together take overall responsibility and authority for ensuring conformance with the ASI Performance Standard. Adequate resources are provided.
2.3a Environmental and Social Management Systems (environmental)	Conformance	One of the two Managing Directors and the Plant Manager together take overall responsibility and authority for ensuring conformance with the ASI Performance Standard. Adequate resources are provided.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has defined its Social Management System in an adequate process description, which is adequate to the size and nature of the business. Implementation was demonstrated throughout the Audit.
2.4 Responsible Sourcing	Conformance	The Entity has issued and communicated its supplier Code of Conduct, covering environmental, social and governance issues. This Code (in German language) can be accessed via the following link: https://www.stockachalu.com/app/download/7603654181/Lieferanten+Verhaltenskodex.pdf?t=1563806282 . Suppliers are requested to sign it.
2.5 Impact Assessments	Conformance	The Entity has developed and implemented systems and processes to conduct Impact Assessments for New Projects or major changes to the existing Facility. The recent project (new chimney, filters and new furnace) lasted from 2018-2020. The project was started before joining ASI in December 2018.
2.6 Emergency Response Plan	Conformance	As confirmed by document review, interviews and a site tour, the Entity has site specific Emergency Response Plans in place. They were developed in collaboration with relevant Stakeholders (e.g. fire brigade) and are communicated internally. The plans comprise preventive and corrective measures.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Criterion is not relevant for the time being, as there are no known plans for Closure, Decommissioning or Divestment. However, the Entity has defined responsibilities and set rules to ensure that in the event of Closure, Decommissioning or Divestment, all legal and ASI requirements will be met. The site is an industrial area, active since decades, there are no mining activities.
2.8 Closure, Decommissioning and Divestment	Conformance	The Criterion is not relevant for the time being, as there are no known plans for Closure, Decommissioning or Divestment. However, the Entity has defined responsibilities and set rules to ensure that in the event of Closure, Decommissioning or Divestment, all legal and ASI requirements will be met. The site is an industrial area, active since decades, there are no mining activities.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published its first Sustainability Report on its website: https://www.stockachalu.com/nachhaltigkeit/ . It is intended to issue such Report on an annual basis.
3.2 Non-Compliance and liabilities	Minor Non-Conformance	As witnessed by top management, there are no proceedings pending and no sanctions were imposed since the acquisition by the current owner. However, data on fines, judgments, penalties and non-monetary sanctions have not yet been published. The Entity intends to rectify the finding with the next issue of the Sustainability Report due for publication in Autumn 2020.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented Systems and Processes (Code of Conduct, training, risk assessments and periodic financial Audits) that conform to Anti-Corruption requirements related to payments to governments and facilitation of payments.
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	Minor Non-Conformance	The Entity has established an accessible Complaints Resolution Mechanism, adequate to the size and nature of its business.

CRITERION	RATING	COMMENT
		<p>All Stakeholders and rightsholders can direct requests or concerns via mail, email or phone (see: https://www.stockachalu.com/kontakt-agb-s/).</p> <p>However, the grievance mechanism itself has not yet been adequately communicated to external Stakeholders.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	<p>The Entity produces only one Product (aluminium ingots) and has evaluated its cradle-to-gate life cycle impact, using data from European Aluminium Association (EAA) Report 2018.</p> <p>This Life Cycle Assessment (LCA) needs to be reviewed, improved and documented to provide consistency and transparency:</p> <ul style="list-style-type: none"> • The methodology has not yet been defined and documented. • The site has not demonstrated that all relevant impact categories were considered in the LCA. • Some data was inconsistent.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>There has been no request yet from customers on LCA so far. The Entity should get ready to answer such requests.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Minor Non-Conformance	<p>The Entity has publicly communicated its LCA information in its "Sustainability status 2019" but no underlying assumptions were included. A copy of the latest sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/.</p> <p>Since then, the LCA has been amended with underlying assumptions and using environmental data from EAA (European Aluminium Association) environmental profile Report 2018: https://european-aluminium.eu/resource-hub/environmental-profile-report-2018/.</p> <p>The Entity intends to make these assumptions available in the next issue of their sustainability Report.</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 publicly discloses its goal on its "best use of scrap" in its "Sustainability status 2019".</p>

CRITERION	RATING	COMMENT
		<p>A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 7).</p> <p>As confirmed by Document review, interviews and a site tour, the Entity firmly controls its Process scrap. When scrap is generated, the site collects 100% of the scrap for recycling as the Entity's core activity is to recycle external scraps.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity publicly discloses its goal on its "best use of scrap" in its "Sustainability status 2019". A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 7).</p> <p>The Entity thoroughly separates alloys for recycling as confirmed by Document review, interviews and a site tour. As a recycler, the Entity must optimize its alloy separation and improve efficiency.</p>
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	<p>The business model of the Entity is based on maximizing the recycling of Secondary aluminium and this is their goal.</p> <p>The Entity has defined its strategy for the collection and recycling of Products at end-of-life in a Procedure.</p>
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	<p>The Entity supports programs to increase recycling rates in Germany through its active membership in the German general association of the aluminium industry (GDA, "Gesamtverband der Aluminiumindustrie e.V.").</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The Entity publicly discloses its GHG emissions and its energy use by source in its "Sustainability status 2019". A copy of the latest sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (pages 18 and 20). The Entity should improve its methodology for reporting to ensure consistency. It is planned to eliminate inconsistencies in the next Report, due Autumn 2020.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity publicly discloses its GHG emissions target in its "Sustainability status 2019" Report.</p>

CRITERION	RATING	COMMENT
		A copy of the latest sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (pages 18 & 27).
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.

PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	The Entity measures very precisely its Emissions to Air and Reports it to the local environment authority on an annual basis. The Entity has plans to minimize its adverse impacts and reported it in its "Sustainability status 2019". A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 23).
6.2 Discharges to Water	Conformance	The Entity does regularly measure the quality of its wastewater and Reports it to the local environment authority on an annual basis. The Entity has plans to minimize its adverse impacts and reported it in its "Sustainability status 2019". A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 17).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	As confirmed by document review, interviews and a site tour, the Entity performed risk assessments and implemented prevention measures on material leakages (to air, water and soils).
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Following the assessment, the Entity performed risk assessments and implemented prevention measures on material leakages (especially on the local stream and against dust).
6.4a Reporting of Spills (immediate disclosure)	Not Applicable	The Entity has an emergency plan that covers potential and significant spills and plan a communication to affected parties. There were no significant spills within the last 10 years.

CRITERION	RATING	COMMENT
		The Entity intends to report this information in its following issues of its Sustainability Report, the next being due for publication in Autumn 2020. A Procedure specifying the need to communicate the "volume, type and potential impact" of significant spills has been established.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has an emergency plan that covers potential and significant spills and reportedly had no significant spills within the last 10 years. A Procedure covers the need to publicly disclose Impact Assessments of the spills and remediation actions taken.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has managed its wastes in accordance with the Waste Mitigation Hierarchy and should ensure future Waste management will also follow the same Principles.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclosed its annual Waste quantities on its Sustainability status 2019 Document. A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 16). A more detailed waste statistic has been made available additionally (https://www.stockachalu.com/app/download/7729116381/Abfallstatistik+2019.pdf?t=1595519058)
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.

CRITERION	RATING	COMMENT
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The "German Recycling Management Act" (KrWG) forbids landfill of Dross. 100% of the Dross is gathered and recycled internally as confirmed by document review, interviews and a site tour. Recycling of Dross residues is at the core of the Entity's activities as it also does it for external Entities.
6.8b Dross (recycling)	Conformance	The "German Recycling Management Act" (KrWG) forbids landfill of Dross. 100% of the Dross is gathered and recycled internally as confirmed by Document review, interviews and a site tour. Recycling of treated Dross residues is at the core of the Entity's activities as it also does it for external Entities.
6.8c Dross (review of alternatives)	Conformance	This Criterion is Not applicable, as (in line with local legislation), 100% of the Dross is gathered and recycled internally as confirmed by Document review, interviews and a site tour.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to strict local regulations and publicly report its use in its latest Sustainability status. The Entity could improve its reporting to avoid misunderstandings. A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 17).
7.1b Water assessment (risk assessment)	Conformance	The Entity assessed its water-related risks in Watersheds in the Entity's Area of Influence as confirmed by document review, interviews and a site tour. The Area of Influence only includes the facility ground, a groundwater source, the neighbouring stream and the neighbouring company's ground.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Not Applicable	This Criterion is Not applicable, as the Entity rated all assessed risk to Watersheds, as low. However, the Entity has implemented preventive measures to reduce consumption and pollution.
7.2b Water management (monitoring)	Not Applicable	This Criterion is Not applicable, as the Entity rated all assessed risk to Watersheds, as low.
7.3 Disclosure of water usage and risks	Conformance	The Entity publicly reports its water withdrawals and use in its Sustainability status. A copy of the latest Sustainability status can be found via the following link: https://www.stockachalu.com/nachhaltigkeit/ (page 17).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity implemented an environmental impact assessment that covers biodiversity issues and there is no material impact.
8.2a Biodiversity management (Biodiversity Action Plans)	Not Applicable	The Entity implemented an environmental Impact Assessment that covers biodiversity issues. This Criterion is Not applicable as no impact has been rated .
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Not Applicable	The Entity implemented an environmental Impact Assessment that covers biodiversity issues. This Criterion is Not applicable as no impact has been rated material.
8.2c Biodiversity management (reporting)	Not Applicable	The Entity implemented an environmental Impact Assessment that covers biodiversity issues. This Criterion is Not applicable as no impact has been rated material.
8.3 Alien Species	Conformance	The Entity does not participate in the introduction of Alien Species. The only potential risk is with the use of wooden pallets. All pallets are sourced locally and shipments to customers are only to neighbouring countries in Europe.
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.

CRITERION	RATING	COMMENT
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 issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights. The code can be accessed via the following link: https://www.stockachalu.com/nachhaltigkeit/ .
9.1b Human Rights Due Diligence (Process)	Conformance	The Entity conducted a documented Human Rights Due Diligence assessment. As witnessed by interviewed Stakeholders and management, there are currently no salient issues with regard to Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity's Human Rights assessments has confirmed that there are no salient adverse Human Rights impacts present at the audited site.
9.2 Women's Rights	Conformance	The Entity has developed and implemented Policies, Systems, Procedures and Processes that conform to the women's rights requirements. During the site tour, interviews and Document review, no indication for deliberate discrimination of women was observed.
9.3 Indigenous Peoples	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources

CRITERION	RATING	COMMENT
		are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities. There are currently no salient issues with regard to Human Rights as confirmed by interview of the local authority and the results of the Human Rights Due Diligence.
9.7b Local Communities (impacts)	Conformance	The Entity operates within the limits of its permits. Emissions-related negative effects on the neighbourhood have been or will be significantly reduced by the recent modernization of the (new furnace, increased capacity of the filter system and discharge of the exhaust gases through a new chimney.
9.7c Local Communities (livelihoods)	Conformance	Evidence provided during the assessment confirmed that there are no salient issues with Local Communities and therefore no need for action. The Entity actively cooperates with the Community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in Conflict-Affected or High-Risk areas. The Entity does not source aluminium from or deliver to conflict affected or High-Risk areas. The Entity has assessed the risk inherent to sourcing and worked with key suppliers to evaluate the risk. Suppliers are obliged to respect the Entity's "Responsible Sourcing Policy", in which it is stated that a supplier must not be active in conflict areas or at least does not contribute to escalation and Human Rights violations through its Business Activities (see https://www.stockachalu.com/app/download/7729245581/Nachhaltige+Einkaufspolitik+StockachAlu+2020.pdf?t=1595585928).

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9.9 Security practice	Not Applicable	The site does not employ any security forces. Entity does not operate in CAHRA.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the rights of Workers to unite freely in the unions, seek representation and join the works council without interference. A freely elected worker representation (works council) is in place.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity does respect the right of Collective Bargaining. It adheres to the Collective Bargaining Agreement (CBA) negotiated on site level. However, the Entity is not a Member of the employersqCollective Bargaining Community which negotiates on branch level with the union.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion of the ASI Performance Standard is Not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates/is located/seated.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected. The youngest worker (apprentice) was 17 years old. There are robust practices in place to ensure that children are not employed.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of Child Labour and does not engage in or supporting hazardous Child Labour. Young workers are employed for educational purpose only. If at all, work with hazardous substances happens only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	As confirmed by site tour and interviews, the Entity does neither use, nor support the use of Child Labour and does not engage in or supporting worst forms of Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support human trafficking, either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (Migrant Workers)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require Migrant Workers to lodge deposits or security payments, either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3d Forced Labour (Debt Bondage)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not hold workers in Debt Bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of workers in the workplace, as confirmed by interviews and document review. The Entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not retain original copies of workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review. Applicants must present an ID, but only a copy will be filed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	As confirmed by interviews and document review, the Entity does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation,

CRITERION	RATING	COMMENT
		<p>marital status, family responsibilities, age, or any other condition that could give rise to Discrimination.</p> <p>Still, there is the need to overcome the historical disadvantage of women. Employees received diversity and anti-discrimination training.</p>
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	<p>The Entity does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry Standard, as confirmed by Document review and Worker interviews.</p> <p>Working Time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid are substantially above the legal minimum. They are in line with the industry Standard.</p>
10.7b Remuneration (method of payment)	Conformance	As has been verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented.
10.8 Working Time	Conformance	<p>The Entity does comply with Applicable Law and industry Standards on Working Time, public holidays and paid annual leave.</p> <p>Working Time is part of each employment contract. Clocking-in System is in place. Records are on hand.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	<p>The Entity has issued and communicated its Environment, Occupational Health and Safety Policy. It can be found on the company's website</p> <p>https://www.stockachalu.com/nachhaltigkeit/.</p>

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity applies its environment, Occupational Health and Safety (EOH&S) Policy to all Workers and Visitors of its site.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	The Entity has issued and communicated a documented environment, Occupational Health and Safety Policy (https://www.stockachalu.com/app/download/7603653981/EHS+Politik+ALU-ASO.pdf?t=1595519058) which contains a statement to comply with Applicable Law and "Core Safety Rules" (https://www.stockachalu.com/app/download/7603654081/Kernsicherheitsregeln+StockachAlu+und+ASO.pdf?t=1595519058).
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has issued a documented environment, Occupational Health and Safety Policy. The text of the Policy includes a statement that Workers have the right to stop their work in an unsafe situation.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has implemented a documented Occupational Health and Safety Management System. However, one gap has been identified that need to be addressed in order to be fully conformant with ASI requirements. This gap relates to the adequacy of the risk assessments concerning psychological factors and mental wellbeing.
11.3 Employee engagement on health and safety	Conformance	The involvement of employees in topics related to occupational health & safety (OH&S) takes place on the one hand through periodic OH&S committee meetings (on a quarterly basis) and through cooperation with the works council, whose statutory task is to look after the safety and well-being of the employees.
11.4 OH&S performance	Conformance	The Entity periodically evaluates its Occupational Health and Safety (OH&S) performance. Leading and lagging indicators are used to monitor and evaluate the effectiveness of the OH&S Management System on a monthly or annual basis (documented in monthly Report and annual sustainability Report).

Document Control and Version History

Revision	Date	Notes
0	31 January 2020	Issued (Provisional Certification)
1	1 October 2020	Surveillance Audit (Full Certification)