

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

GRÄNGES FINSPÅNG AB

CERTIFICATE
NUMBER

116

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

10 FEBRUARY 2021

DATE OF EXPIRY

9 FEBRUARY 2022

CERTIFIED SINCE

10 FEBRUARY 2021

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

Design and manufacture of rolled strip and sheet
aluminium.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gränges
ENTITY NAME	Gränges Finspång AB
CERTIFICATION SCOPE	Design and manufacture of rolled strip and sheet of aluminium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouse• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	18 – 19 November 2020
AUDIT REPORT SUBMISSION	14 January 2021

AUDIT SCOPE Gränges Finspång AB designs and manufactures rolled strip and sheet of aluminium at the site located in Finspång, Sweden. It has an annual capacity of 100,000 tonnes.

Supply chain activities included in the audit scope:

- Casthouse
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (November 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. In response to the desktop nature of this audit, the auditor had undertaken additional assessment activities prior to the November audit and were also considered in the auditor's overall assessment of conformance.

AUDIT OUTCOME	Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	10 February 2021 - 9 February 2022
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	9 August 2021
CERTIFICATE NUMBER	116

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity demonstrated robust awareness and monitoring of Applicable Law and regulatory requirements. The Entity defined applicable procedures to monitor compliance, which includes:</p> <ul style="list-style-type: none"> • Regular legal updates from dedicated legal firm and local industry associations (on a quarterly basis) • Regular Management Reviews of compliance status against EHS regulatory requirements • Regular independent audits to maintain certification status against ISO 14001 Collective Bargaining Agreement governing labour law requirements • Internal audit.
1.2 Anti-Corruption	Conformance	<p>Gränges Finspång AB works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity established adequate Anti-Corruption measures, such as policies, training, due diligence checks and a whistleblowing line, endorsed by senior management. The Entity undertakes regular internal audits of its Anti-Corruption Management System, undertaken by competent personnel.</p> <ul style="list-style-type: none"> • Employee training compliance is regularly monitored • Anti-Corruption policies are communicated to suppliers and third parties via Supplier Code of Conduct and supplier onboarding processes.
1.3 Code of Conduct	Conformance	<p>Gränges established a Code of Conduct which is publicly available via the link below: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2018.pdf</p> <p>Furthermore, internal and external Stakeholders can access the Entity's whistleblowing line to raise concerns and to report any potential breaches of the Code of Conduct in a confidential manner. Any interested party can access the whistleblowing line, operated by an independent third party: https://www.granges.com/globalassets/02.-om-granges/07.-bolagsstyrning/08.-visselblasning/181212_granges-whistleblower-function---information-and-rules.pdf</p>

CRITERION	RATING	COMMENT
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Gränges Finspång AB follows corporate standards and policies consistent with the environmental, social and governance practices included in this Standard. The Entity operates at an historic site, established in the 1920s and is well embedded in the Local Community.</p> <p>The Entity conducted an analysis of ASI Principles and equivalent Policies and concluded all ASI Principles are covered. The site is regularly audited against ISO 14001:2015 Management System standard by Lloyd's Register.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Gränges Finspång AB demonstrated senior management endorsement for its EHS and Employee Policies and secures resources to implement the policies. The Policies are available at: https://www.granges.com/sustainability/policies/</p> <p>Key environmental, social and governance issues are regularly reviewed by senior management during the management reviews. The provision of environmental investments for 2020-2024 were reviewed during the Audit. For further information about the Entity's environmental and social goals and strategy, please see Sustainability Report 2019 on page 20: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity's policies related to environmental, social and governance aspects are communicated externally through its corporate website: https://www.granges.com/sustainability/policies/</p> <p>The policies are also communicated to suppliers and subcontractors through various forms, such as Supplier Code of Conduct and onsite onboarding and Contractor training process.</p>
2.2 Leadership	Conformance	<p>Gränges Finspång AB nominated the Supply Chain Director the responsibility for implementing the ASI Performance Standard at the site. The nomination was communicated internally.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Gränges Finspång AB operates an Integrated Management System which is certified to ISO 14001:2015 and is valid for the Entity's ASI Performance Standard Certification Scope and is recognised as meeting the requirements of 2.3a of the ASI Performance Standard. The Audit was</p>

CRITERION	RATING	COMMENT
		<p>carried out by independent Third Party, Lloyds Register. Some observations and minor deviations were noted. The Entity has established a Corrective Action Plan to address these and since been closed out. The Entity also holds an ISO 50001:2011 Management System Certificate.</p>
<p>2.3b Environmental and Social Management Systems (social)</p>	<p>Conformance</p>	<p>The Entity has documented and implemented an Integrated Social Management System. Gränges Finspång AB identified its key interested parties and material issues. At a corporate level, the Stakeholder engagement approach is disclosed on page 98 of their Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p> <p>The Entity identified Local Community engagement processes and keeps track of monitoring actual and potential impacts. Labour Rights and HR-related matters are governed through Gränges Finspång AB Collective Bargaining Agreement and consultations with Labour Unions.</p>
<p>2.4 Responsible Sourcing</p>	<p>Conformance</p>	<p>Gränges operates Supplier Code of Conduct across all its locations. The Responsible Sourcing Policy is currently under management review. The supply chain diligence processes have been reviewed for local implementation during the Audit. Gränges adopted a supply chain risk assessment methodology to screen metal suppliers and requests EcoVadis assessments based on the suppliers' risk profile.</p>
<p>2.5 Impact Assessments</p>	<p>Conformance</p>	<p>Gränges Finspång AB established systems and procedures to evaluate environmental, energy, safety, cultural and Human Rights impacts when performing major projects. The site is currently investing in a new project to automate coils production on the premises. Environmental Impact Assessments (e.g. asbestos removal, hazardous materials management) and issues concerning workforce, consultations with Labour Union were reviewed during the Audit. Procurement of best available technologies and new equipment were integrated into the project to improve the environmental footprint.</p>
<p>2.6 Emergency Response Plan</p>	<p>Conformance</p>	<p>Gränges Finspång AB operates an Integrated Management System certified to ISO 14001:2015, covering the Entity's Certification Scope which is accepted as meeting the requirements of 2.6</p>

CRITERION	RATING	COMMENT
		Emergency Response Plan of the ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	Gränges reviews environmental, social and governance issues in the due diligence process for mergers and acquisitions. Gränges, at a corporate level, recently completed acquiring a downstream site in Poland. Further information about the acquisition is available via the below press release: https://www.granges.com/newsroom/press-releases/2020/granges-completes-the-acquisition-of-aluminium-konin-and-finalizesthe-issue-in-kind/
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has plans to close down a mill in the parameters of the site. The decommissioning project is governed by Swedish law and the environmental permit requirements (e.g. soil and concrete samples, hazardous material management). The Decommissioning of equipment and assets will be carried out by specialized partners and Contractors. The environmental and health and safety risk assessments are regularly updated.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Gränges publishes a Sustainability Report aligned with GRI G4 Sustainability Reporting Guidelines on an annual basis, which includes information and data from the Finspång site. The report is available via the link below: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf In addition, the Finspång site reports on its environmental indicators in line with Swedish law on a regular basis to the relevant authorities.
3.2 Non-compliance and liabilities	Conformance	Gränges Finspång has not received significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law since the Entity joined ASI. Gränges Finspång is obligated to report all non-compliances to the Swedish Environmental Authorities. The company is listed on the Swedish stock market and has obligations to immediately disclose any Non-Compliances to shareholders. The Entity's Sustainability Reporting disclosures are aligned with GRI Guidelines.
3.3a Payments to governments (legal and contractual)	Conformance	Gränges accounts are subject to third party independent audits by local accountants on an

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		annual basis which contains a review of payments to Governments. The Entity demonstrated compliance with local laws and regulations. The Entity's Anti-Corruption policies and instructions (e.g. facilitation of payments) govern its compliance and due diligence checks to ensure all payments are made on a legal/contractual basis.
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	Handling external complaints related to environment and health and safety are governed by the Entity's ISO 14001:2015 Management System, which is accepted as meeting the requirements of the ASI Performance Standard.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has implemented its Environmental Management System and evaluates environmental aspects in a life cycle perspective. The Entity established a target to ensure 80% of Gränges products should have verified sustainability information available. Methodology is in line with ISO 14040 and ISO 14044 and scope boundaries were defined.</p> <p>A Life Cycle Assessment procedure has been developed and an Environmental Product Declaration (EPD), considering the products produced, is established and further work is ongoing to cover all Aluminium product ranges.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Gränges Finspång is able to provide Environmental Life Cycle Assessment information to customers upon request and demonstrated its approach to communicate about its LCA approach during the audit. Further information is available in the Entity's Sustainability Report on page 23:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Gränges currently does not publicly disclose information on its Environmental Life Cycle Assessment results as it was undergoing third party assurance at the time of the Audit. The Entity set a target of 80 per cent of Gränges' products to have verified sustainability information available by 2025. Further information about the Entity's LCA approach and Product Disclosures can be found on page 23 of its Sustainability Report:</p>

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		https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf
4.2 Product design	Conformance	<p>Gränges established a strategy to increase sustainable product offerings through product life cycle improvement, through circular economy models with customers, and joint innovation and collaboration to develop low-carbon and sustainable alloys. Further information on project-based improvements can be found below:</p> <p>https://www.granges.com/trillium/</p> <p>Further information on the Entity's strategy to provide sustainable product offerings is available on page 23 of its Sustainability Report 2019:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity established daily monitoring and controls to minimize the amount of scrap generated internally. The Entity defined scrap collection and recycling mechanisms based on the properties of the scrap produced. Close to 100% scrap is recycled internally, very small quantities are sold to external partners for further recycling.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. Almost 100% of the scrap is recycled internally, with small quantities being sold for further processing. The Entity established key performance indicators to monitor yield and implements corrective actions to achieve continuous improvements in line with its quality policy and procedures.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>Gränges Finspång established targets to increase the recycled content of end products and 20 per cent of total sourced metal inputs to be Recycled Aluminium by 2025. At a group-level, the Entity increased the share of Recycled Aluminium to 19.8 per cent of total sourced metal inputs, up by 3.0 percentage points versus 2018. Further information is available in the Entity's Sustainability Report 2019 on page 24:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>

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4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Gränges is involved and engaged and supporting activities promoting collecting and recycling systems to increase recycling rates. This includes the Swedish Aluminium Association membership https://www.svensktaluminium.se/om-oss/ and European Aluminium Association membership https://www.european-aluminium.eu/about-us/our-members/ . The Entity is actively taking part in taskforces and committees to increase the recycling rates of end-of-life products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Gränges Climate Strategy available on page 22 of its Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf Gränges follows the Greenhouse Gas Protocol (GHG Protocol) guidelines to calculate its climate impact, from Bauxite extraction to delivery of Gränges' products to customers. Material sources of GHG emissions and Energy use are disclosed on page 22 and 26 of its Sustainability Report.
5.2 GHG emissions reductions	Conformance	Gränges Climate Strategy is disclosed on page 22 of its Sustainability Report 2019: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf Carbon emissions intensity from own operations and purchased energy to be reduced by 25 per cent by 2025. The Entity is in the process of setting a GHG Scope 3 emissions reduction target. In 2019, Gränges reduced its total GHG emissions by 14 percent to 3,910 ktonnes CO2e (4,520).
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	Gränges Finspång established robust systems and procedures to report on Emissions to Air to national authorities and established monitoring processes on Emissions to Air. Gränges Finspång

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		<p>demonstrated all conditions were under the permit thresholds. An environmental programme is established to minimise Emissions to Air further. Emission to Air data at a Group-level is disclosed in the Gränges Sustainability Report page 104: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>
6.2 Discharges to Water	Conformance	<p>Gränges Finspång reports their water effluents to the environmental authority. The limits set by local and national authorities to water pollutants are adequately measured and controlled. For further information on Gränges water management, please see page 27 and 105 of its Sustainability Report (GRI 303: Water and effluents 2018): https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p> <p>The rating of this Criterion will be re-confirmed subject to the onsite visit and onsite review of daily monitoring and Discharges to Water analysis & sampling.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity is obliged to have a spill risk assessment and spill response plans for 'small' and 'significant' spills as defined within its operating license. Spills are regulatory reported to the environmental authorities. The Entity maintains robust Standard Operating Procedures in case of spills (e.g. most common aspect is rolling oil leakages from tanks), critical controls have been defined and mitigation measures identified. Regular training is provided to employees. The rating of this Criterion will be re-confirmed during the onsite component of the audit subject to further review of the site's Emergency Response Plan and training to employees.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity established robust critical controls and Standard Operating Procedures in case of spills and leakage that may contaminate air, soil or water. The environmental risk assessment is regularly updated as part of the Entity's Integrated Management System which is certified against ISO 14001:2015. External communication plans were reviewed during the audit. The rating of this Criterion will be re-confirmed during the onsite component of the audit.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>All leakages must be reported to authorities even the smallest volumes of 5 litres according to</p>

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		Swedish law. No major spills happened at the site which would require publishing Impact Assessment and remediation actions. The site's Environmental Management System is certified to ISO 14001:2015 which covers this aspect.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity is obliged to have a spill risk assessment and spill response plans for 'small' and 'large' spills as defined within its operating license to local authorities, including any impacts on soil, water, air etc. and mitigation measures taken.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management plan in accordance with a waste mitigation hierarchy. The Entity identified waste streams and associated waste disposal methods. Hazardous and non-hazardous waste are disclosed to the local authorities on an annual basis. Waste management is included within the ISO 14001:2015 Management System. The rating of this Criterion will be re-confirmed during the onsite component of the audit subject to the site tour.
6.5b Waste management and reporting (disclosure)	Conformance	Hazardous and non-hazardous Waste are disclosed to the local authorities on an annual basis according to environmental permit requirements. The rating of this Criterion will be re-confirmed during the onsite component of the audit subject to the site tour.
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 (state 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.

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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	Gränges Finspång demonstrated it is meeting ASI Performance Standard requirements related to dross and makes investments to continuously improve yield and reduce the amount of dross generated. The rating of this Criterion will be re-confirmed during the onsite component of the audit.
6.8b Dross (recycling)	Conformance	Salt slag is also sent to a third party for recycling. They have a process for aluminium and alumina oxide to make concrete. No treated dross residues are sent to landfill. The rating of this Criterion will be re-confirmed during the onsite component of the audit.
6.8c Dross (review of alternatives)	Conformance	Salt slag and other dross residues are sent for further recycling in other industries. No dross residues are sent to landfill from Gränges operations. The rating of this Criterion will be re-confirmed during the onsite component of the audit.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Gränges Finspång conducted a robust water risk assessment, identified its water withdrawal by source and type in consultation with relevant local Stakeholders. The operational control and yearly environmental data collection is defined by the site.
7.1b Water assessment (risk assessment)	Conformance	The Entity's main water source is surface water, from the upstream Lake Bonern. The Entity is using some further water from the water municipality. Water usage and water discharge points were identified and mapped in its Area of Influence. The site has engaged with relevant Stakeholders (e.g. employees, shareholders and authorities) to define risks and Stakeholder expectations. Further information on Gränges Water management plan and corporate performance is disclosed on page 105 of its Sustainability Report: https://www.granges.com/globalassets/04.-

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		hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf
7.2a Water management (management plans)	Conformance	<p>The Entity set a target to have all Gränges sites to complete and implement a local water management plan by 2025. Gränges Finspång has set a target to reduce its water consumption by 20% by 2025. For further details, please see page 27 in the Gränges Sustainability Report 2019:</p> <p>https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p> <p>The rating of this Criterion will be re-confirmed during the onsite component of the audit following the site observations.</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity established operational controls and an environmental monitoring plan. The governance of the Water Stewardship plan was well defined, with relevant experts from the environmental, as well as external communications functions. The progress on the water management plan is regularly reviewed during the annual management reviews. The rating of this Criterion will be re-confirmed during the onsite component of the audit following site observations and Stakeholder interviews</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity's water management approach as well as performance against established targets is available on page 27 of its annual Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf (GRI 103: Management Approach 2016; GRI 303: Water and effluents 2018).</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>As part of the 2006-2007 and 2018 permitting process, a biodiversity risk assessment was carried out for the site. The biodiversity assessment which was conducted by a competent third party concluded no material impacts on biodiversity as a result of the site's activities. This report was shared with the local authorities.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	<p>The site's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.</p>

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8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The site's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.
8.2c Biodiversity management (reporting)	Not Applicable	The site's biodiversity risk assessment concluded that the site has no material impacts on biodiversity values, therefore this Criterion is not applicable.
8.3 Alien Species	Unable to Rate	As evidence is kept onsite, this Criterion could not be reviewed during the remote audit. The review of this Criterion will be completed during the onsite component of the audit.
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 mines)	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	Gränges' Code of Conduct and Supplier Code of Conduct cover Human Rights Principles and expectations. The Policy references the UN Global Compact Ten Principles and other international best practices. Please see below link to access these Policies: https://www.granges.com/sustainability/policies/
9.1b Human Rights Due Diligence (process)	Conformance	Gränges Finspång carries out regular due diligence checks as part of its EcoVadis assessments on the critical suppliers of Primary Aluminium. The site carried out an interested parties analysis in line with its certified ISO 14001 Management System. Gränges conducts regular stakeholder engagement to identify its material issues, including Human Rights expectations. For more details, please see page 99 of its Sustainability Report 2019: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	Gränges operates a whistleblowing function where third parties can raise any concerns related to

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		Human Rights impacts. To date, no complaints or other remediation claims were received related to Human Rights. For more information, please see Gränges whistleblowing function and ethical business practices page: https://www.granges.com/sustainability/ethical-business-practices/
9.2 Women's Rights	Conformance	Gränges adopted a non-discrimination policy and has plans in place to increase gender diversity at the plant in line with good practice. For further information, please see page 29 of its Sustainability Report 2019: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous minority groups in the Area of Influence of the Entity. Please see: https://www.sametinget.se/samer
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous minority groups in the Area of Influence of the Entity. Please see: https://www.sametinget.se/samer
9.5 Cultural and sacred heritage	Conformance	The protection of cultural and sacred heritage sites are governed by the Entity's environmental permitting process. There are historic industrial buildings onsite dating back to the 16th century which are protected. The rating of this Criterion will be confirmed during the onsite component of the audit following further stakeholder interviews.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable as no resettlements took place.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable as no resettlements took place.
9.7a Local Communities (rights and interests)	Conformance	The Gränges Finspång site's environmental permit was renewed in 2018, and no adverse impacts have been identified on the Local Community. Furthermore, the site undertakes regular interested parties analysis in line with its ISO 14001 Management System requirements. The site supports local livelihoods through its annual CSR activities. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder and community interviews.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The Gränges Finspång site's environmental permit was renewed in 2018, and no adverse impacts have been identified on the Local Community. Furthermore, the site undertakes regular interested parties analysis in line with its ISO 14001 Management System requirements. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder and community interviews.
9.7c Local Communities (livelihoods)	Conformance	The site supports local livelihoods through its annual CSR activities. For further details, please see page 98 of the Entity's Sustainability Report 2019: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder and community interviews.
9.8 Conflict-Affected and High-Risk Areas	Conformance	Gränges implemented a Supplier Code of Conduct and supplier risk assessments to ensure it is not sourcing materials from Conflict-Affected or High-Risk Areas. The Entity implemented a Supply Chain Due Diligence Programme to further manage risk from the supply chain related to the areas of anti-bribery and corruption, trade compliance, child and slave labor, criminal history, human trafficking and conflict minerals.
9.9 Security practice	Conformance	Gränges set Security Standards in its arrangements with security providers, which includes considerations for Human Rights protection. The third party security personnel have been trained on the Entity's Code of Conduct as well as mandatory training for security personnel as required by Swedish law. A risk assessment for security arrangements is updated on a regular basis. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews and site observations.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Freedom of Association and Right to Collective Bargaining is well organised under Swedish Law. The Entity has implemented a Code of Conduct committing to Freedom of Association and Right to Collective Bargaining: https://www.granges.com/globalassets/04.-

CRITERION	RATING	COMMENT
		hallbarhet/11.-policyer/granges_codeofconduct_2020.pdf Trade Unions present at the Entity have agreed a Collective Bargaining Agreement. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews and interviews with Labour Union representatives.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Freedom of Association and Right to Collective Bargaining is well organised under Swedish Law. These Agreements are regularly negotiated. Site management holds regular reviews and meetings with the labour union representatives about production forecast and staff levels, updating the furlough scheme. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews and interviews with labour union representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Swedish Law allows the Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	Gränges Human Rights Policy and Code of Conduct both prohibit the use of Child Labour. The Entity does not employ anybody at this site under the age of 18 as a function of Swedish law. Apprenticeships and related safety measures are strictly implemented. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour. Apprenticeships and related safety measures are strictly implemented following Swedish law requirements. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support the worst forms of Child Labour. This aspect is addressed via the Entity's Code of Conduct, Supplier Code of Conduct and Health and Safety Management System. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.3a Forced Labour (human trafficking)	Conformance	The Collective Bargaining Agreement and internal HR practices ensure that Gränges meets its

CRITERION	RATING	COMMENT
		<p>obligations to protect its Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. All Workers must have a Swedish social security number to be able to undertake work onsite. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3b Forced Labour (deposits, fees, advances)</p>	<p>Conformance</p>	<p>Collective Bargaining Agreement and local employment policies ensure any form of deposit, recruitment fee or equipment in advance from Workers is not required. The Entity undertook due diligence reviews of its recruitment agencies to ensure they uphold these expectations and are compliant with Swedish law. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3c Forced Labour (migrant workers)</p>	<p>Conformance</p>	<p>Collective Bargaining Agreement, Code of Conduct and internal routines, instructions and practices ensure that Gränges Finspång meets its obligations to protect its Workers from Forced Labour in all aspects addressed in the ASI Performance Standard. A due diligence of recruitment agencies is carried out. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3d Forced Labour (debt bondage)</p>	<p>Conformance</p>	<p>Collective Bargaining Agreement and internal HR practices ensure that Gränges meets its obligations to protect its Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. All Workers must have a Swedish social security number to be able to undertake work onsite. The Entity does not provide any loans to Workers and it does not hold Workers in Debt Bondage or force them to work, in order to pay off a debt. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3e Forced Labour (freedom of movement)</p>	<p>Conformance</p>	<p>The Collective Bargaining Agreement and internal HR practices ensure that Gränges meets its obligations to protect its Workers from Forced Labour. The Entity hires indirect workforce via</p>

CRITERION	RATING	COMMENT
		<p>recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. The Entity does not unreasonably restrict the freedom of movement of Workers. Employment contracts set out the conditions for the notice period aligned with the Collective Bargaining Agreement. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Conformance</p>	<p>The Collective Bargaining Agreement and internal HR practices ensure that Gränges meets its obligations to protect its Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. The site takes copies of Workers' identity documents for their personnel files, the Entity adheres to strict data protection rules. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.3g Forced Labour (freedom to terminate employment)</p>	<p>Conformance</p>	<p>The Collective Bargaining Agreement and internal HR practices ensure that Gränges meets its obligations to protect its Workers from Forced Labour. The Entity hires indirect workforce via recruitment agencies and due diligence checks of recruitment agencies were carried out as required by the ASI Performance Standard. Notice period and conditions are governed by the Collective Bargaining Agreement and set out in employment contracts as per Swedish law. The rating of this Criteria will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
<p>10.4 Non-Discrimination</p>	<p>Conformance</p>	<p>The Entity has developed and implemented an Equal Employment Opportunity Policy addressing zero tolerance to discrimination and a Code of Conduct publicly available: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/granges_codeofconduct_2020.pdf Further information on the Entity's diversity performance is available on page 29: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf</p>

CRITERION	RATING	COMMENT
		The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.5 Communication and engagement	Conformance	Gränges Finspång operates a joint Health and Safety Committee where issues can be raised by Workers and discussed with senior management. Such mechanisms were established at department level per workshop. The Entity has an open and inclusive communication between management, Workers and union which is formalised within the Collective Bargaining Agreement. The Entity conducts regular employee surveys. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.6 Disciplinary practices	Conformance	The Swedish labour laws define disciplinary procedures which are mirrored in the local Collective Bargaining Agreement. The Gränges corporate Code of Conduct relating to disciplinary practice shows strong compliance with international and best practice on this subject. The Entity implemented a grievance mechanism and has certified managers to conduct investigations into any breaches against the Code of Conduct. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.7a Remuneration (living wage)	Conformance	The Collective Bargaining Agreement together with strong Swedish law assure compliance with this Clause. All staff are under the Collective Bargaining Agreement which ensures that no pay is withheld and that all payments are made monthly directly to chosen bank accounts. There are no disciplinary processes which result in withholding of payment. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.7b Remuneration (method of payment)	Conformance	Wage payments are made via bank transfers to Workers in a timely manner. A sample of employee records were inspected to verify this during the Audit. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.
10.8 Working Time	Conformance	Swedish Law and the Collective Bargaining Agreement on site have resulted in a rigorous on site process whereby staff are not allowed to

CRITERION	RATING	COMMENT
		<p>exceed the maximum extra shifts and total working hours per month. Shift patterns are agreed with the Collective Bargaining Agreement on a regular basis. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to Swedish law. The rating of this Criterion will be re-confirmed during the onsite component of the audit following further stakeholder interviews.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>Gränges Finspång has developed, implemented and communicated a Health and Safety Policy that is endorsed and supported by senior management. The policy is available at: https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Health and Safety Policy covers all Workers and Visitors (e.g. Contractors) undertaking work onsite and in premises under the Entity's control. https://www.granges.com/globalassets/04.-hallbarhet/11.-policyer/gp07-ehs-policy-2020.04.29.pdf</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>Gränges Finspång has developed, implemented and communicated a Health and Safety Policy that is in line with Swedish law and applicable standards.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has developed, implemented and communicated a Health and Safety Policy endorsed and supported by senior management. The policy is a part of induction and is stated to be posted throughout the site. The Entity's Policy includes a reference to the right of Workers to stop unsafe work.</p>
11.2 OH&S Management System	Conformance	<p>The Entity's Health and Safety Management System is part of its overall integrated system which is held on a platform called 'FRAMEWORK'. It is a traditional three tier hierarchical system with policy, procedure and detailed work instruction where necessary. The series of 'Standard Operating Procedures' (SOP's) are comprehensive and are based on 'Critical Controls' to be identified for confined space entry, electrical and uncontrolled release of energy, control of molten metal, lifting operations, falling from heights and falling objects control and vehicular movement. Based on the risk</p>

CRITERION	RATING	COMMENT
		assessment, the operational instructions and processes for operators are updated.
11.3 Employee engagement on health and safety	Conformance	The Entity engages Health and Safety Committees, a monthly joint meeting with all the Committees and Critical Controls Committee's. All employees are allowed to raise health and safety issues. Employee surveys support inclusion within health & safety issues. The rating of this Criterion will be re-confirmed during the onsite component of the audit subject to further stakeholder interviews.
11.4 OH&S performance	Conformance	Health and safety indicators are regularly monitored and also published via Granges Annual Sustainability Report. The site also participates in European Aluminium Association's safety benchmarking every year. For further details, please see page 101 of the Granges Sustainability Report: https://www.granges.com/globalassets/04.-hallbarhet/hallbarhetsrapportering/granges_sustainability_2019.pdf

Document Control and Version History

Revision	Date	Notes
0	10 February 2021	Issued (Provisional Certification)