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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# NOVELIS

CERTIFICATE  
NUMBER

97

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

SZI GMBH

DATE OF ISSUE

2 OCTOBER 2020

DATE OF EXPIRY

1 OCTOBER 2023

CERTIFIED SINCE

2 OCTOBER 2020

AUTHORISED BY

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

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*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

All activities on the Goettingen site to produce  
aluminium Products including:

- ~ Cold rolling
- ~ Coating
- ~ Finishing
- ~ Impact extrusion

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# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

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### OVERVIEW

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MEMBER NAME           Novelis Inc.

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ENTITY NAME           Novelis Deutschland GmbH Werk Goettingen

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CERTIFICATION SCOPE           

- All activities on the Goettingen site to produce aluminium Products including:
  - ” Cold rolling
  - ” Coating
  - ” Finishing
  - ” Impact extrusion

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SUPPLY CHAIN ACTIVITIES           

- Semi-Fabrication

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ASI STANDARD           

- Performance Standard V2

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AUDIT TYPE           

- Certification Audit

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AUDIT FIRM           SZI GmbH

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AUDIT DATE           

- 6 May . 17 June 2020

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AUDIT REPORT SUBMISSION           

- 7 September 2020

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AUDIT SCOPE           The Audit Scope covered all Processes applied in Goettingen Facility.  
Supply chain activities included in the Audit Scope:

- Semi-Fabrication

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

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AUDIT OUTCOME           

- Certification

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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.

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- 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.
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CERTIFICATION PERIOD      2 October 2020 . 1 October 2023

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NEXT AUDIT TYPE              Surveillance Audit

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NEXT AUDIT DATE              1 April 2022

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CERTIFICATION NUMBER      97

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a thorough Process to constantly maintain awareness of and ensure Compliance with the latest Applicable Law.
1.2 Anti-Corruption	Conformance	The topic of Anti-Corruption is regulated at the location Goettingen. Group specifications are trained and implemented at all business levels.
1.3 Code of Conduct	Conformance	The Novelis Code of Conduct is implemented and trained. Suppliers must comply with a Supplier Code of Conduct. <a href="https://novelis.com/de/code-of-ethics/">https://novelis.com/de/code-of-ethics/</a> <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/09/Novelis-Supplier-Code-of-Conduct.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/09/Novelis-Supplier-Code-of-Conduct.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Novelis Environment, Health, Quality, Safety (EHQS) Policy is communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The external communication via the webpage: <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf</a> .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as their EHSQ Policy, the Entity has senior management endorsement and support through provision of resources and regularly review the Policies. The Entity obtained ISO 14001, ISO 50001 and OHSAS 18001 Certifications which are consistent with their ASI Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Novelis EHQS Policy is continuously communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The external communication via the webpage: <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf</a> .
2.2 Leadership	Minor Non-Conformance	Novelis CEO has corporate responsibility and authority to ensure conformance with the Performance Standard. However, no senior Management Representative, having overall responsibility and authority for ensuring conformance with this Standard, has been nominated on Entity level.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	The Entity has documented and implemented both an Environmental Management System according to ISO 14001 and energy Management System according to ISO 50001. These Systems are Certified by an accredited Certification body. However, aspects of ASI Performance Standard shall be integrated in the management review as well.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented an Environmental Management System which has been Certified according to ISO 14001:2015. Furthermore the Entity has implemented and fulfills the requirements of a Social Management System (SA 8000). Internal Social and Compliance Audits are carried out on a regular basis.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity's supplier Code of Conduct is in accordance with the requirements of the ASI Performance Standard. Please find below link to Novelis supplier Code of Conduct: <a href="https://www.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf">https://www.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf</a> . However, the Entity shall approve and maintain supplier and service provider in accordance to its pre-defined Responsible Sourcing aspects (Supplier screening).
2.5 Impact Assessments	Conformance	As part of the internal risk assessments, the influencing factors such as environment, social, Human Rights are recorded and evaluated in the context of New Projects and System changes. No new bigger projects or Major Changes to existing Facilities took place since the Entity joined ASI. The site is located in a highly regulated country (Germany), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorization process (including Human Rights) and the Entity has Systems in place to manage this effectively. However, social aspects are not yet regulated to the same extent as Health & Safety and environmental facets. This has been identified by the Entity and they are working to strengthen their existing Processes.
2.6 Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency Response Plan. External Stakeholders like Community and authority are involved. There are regular trainings with the local fire fighters, the Community and Workers.
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis headquarters are accompanied by a Due Diligence Process and supported by external specialists to reflect environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning Process. Closure, Decommissioning and Divestment are not managed on

CRITERION	RATING	COMMENT
		local level but by corporate Headquarters. There were no Closure, Decommissioning and Divestment plans for the audited Entity since they joined ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is part of the Novelis Group Sustainability Reporting. The group publicly disclosed its governance approach and its material environmental, social and economic impacts in the Novelis group sustainability Report: <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2018/12/Novelis-Sustainability-Report-2018-ENUS-Web.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2018/12/Novelis-Sustainability-Report-2018-ENUS-Web.pdf</a> .
3.2 Non-Compliance and liabilities	Conformance	The Entity is part of the Novelis Global Sustainability Report. Entity specific information on significant fines, judgments, penalties and non-monetary sanctions are published by the district government (Landkreis Göttingen). Public access is ensured via the EU Directive 2003/4/EC executed as %environmental information act (UIG)+
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with the strict local legislation and has implemented Policies and Procedures to conform to this requirement. To prevent corruption, detailed behaviours are described in the Novelis Code of Conduct. It is precisely regulated, for example, which payments are made to authorities.
3.3b Payments to governments (disclosure . Bauxite Mining)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity is Certified ISO 14001:2015 and ISO 45001:2018 and has implemented fine Complaints Resolution Mechanisms. A whistleblowing hotline is in place (NOVELIS ETHICS HOTLINE: 0800-180-6638).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessments are implemented for standard and specialty Products. The requirements of ISO 14040 are fulfilled.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity contributes LIFE CYCLE INVENTORY DATA to regional initiatives e.g. Aluminum Association and European Aluminium Sustainable Development Indicators. Life Cycle Assessments will be delivered to customers for their Products by request (they are including the cradle to gate Process).

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA are available for the relevant Products as well as for a Standard Product. Relevant data can be accessed via the European Aluminum SDI. <a href="https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf">https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf</a> .
4.2 Product design	Conformance	When developing new Products, the topic of sustainability and a new life cycle analysis are always carried out. Environmental Key Metrics have been developed to enhance sustainability, including the environmental life cycle impacts of the end Product.
4.3a Aluminium Process Scrap (targets)	Conformance	A working scrap management is implemented. Aluminum Process Scrap should be reduced to a minimum, if scrap is generated it will be 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is a closed-loop production. Aluminum alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. The recycling strategy captures the Product from the beginning to end of life.
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. Novelis is actively engaged in European initiatives or groups that support and improve National collection rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The plant is not part of the International Greenhouse Gas Trade. EHS figures such as energy consumption, emissions, waste numbers and water consumption are visible in working areas (shopfloor). However, the energy use by source on an annual basis isn't publicly disclosed. In the Novelis Sustainability Report you can only find corporate key figures. <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf</a> ).
5.2 GHG emissions reductions	Conformance	Environmental activities reducing the energy consumption and in line the Greenhouse gas emissions (GHG) since years. GHG emissions KPI's and Targets you can find in the Sustainability Report on page 7: <a href="https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf">https://2gijon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2017/10/Novelis-Sustainability-Report-2017-ENUS.pdf</a> .

CRITERION	RATING	COMMENT
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	Emissions to the air are under tight control according to local regulations and permits. The emissions are monitored, controlled and reduced constantly.
6.2 Discharges to Water	Conformance	Emissions to the water that have adverse effects on humans and the environment are under German law, reported and in line with the operation permit of the Entity.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity performed risk assessments and implemented measures to prevent and detect contamination of air, water and soil. Furthermore regular internal Audits are conducted to verify effectiveness and adherence to defined actions. The Entity performed risk assessments and implemented measures to prevent and detect contamination of air, water and soil. Furthermore regular internal Audits are conducted to verify effectiveness and adherence to defined actions. Emergency Procedures for major risk areas have been introduced.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity performed risk assessments and implemented prevention measures on material leakages. Relevant spills are reported to the authority and by the Authority to all other relevant public interest parties (if necessary).
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Reporting of Spills is regulated, trained and tested. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2014.
6.4b Reporting of Spills (regular reporting)	Conformance	The Reporting of Spills is regulated, trained and tested. There are regular visits by the district government. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2014. <a href="http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf">http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a Waste management strategy. The goals in the field of Waste Management are fulfilled. A reduction of the waste streams is recognizable.



CRITERION	RATING	COMMENT
		The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Authority may, if necessary, request the Report of the Waste officer. On request, the quantities of hazardous and Non-Hazardous Waste will be made available to the public. Regular monitoring by the district government verifies Compliance with legal requirements: <a href="http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf">http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf</a> . However, not all quantities of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal method has been publicly disclosed annually.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to local regulations. An overview of the water entrances, the various consumers and the different wastewater flows are described and regularly reviewed.
7.1b Water assessment (risk assessment)	Conformance	The Entity assessed its water-related risks and implemented prevention measures accordingly in their entire Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity has implemented targets for its water management. This targets are regularly reviewed during authority visits as well as during the Environmental Management System review on an annual basis.
7.2b Water management (monitoring)	Conformance	A water management is implemented. Consumption figures and specifications are regularly monitored and reviewed.
7.3 Disclosure of water usage and risks	Conformance	The required water law approvals are available. The requirements of the Water Resources Act are met. Through regular inquiries of the district government, the requirements are checked (Report § 52 a Abs. 5 BlmSchG: <a href="http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf">http://www.ied-gaa.niedersachsen.de/GOE023100281_GOE999991912.pdf</a> ).

#### PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	Environment Risk assessments are carried out as part of approval Procedures. The risk assessment covers the entire influence area of the Göttingen Plant location including an assessment of biodiversity impacts.
8.2a Biodiversity management (Biodiversity Action Plans)	Not Applicable	There were no Material biodiversity impacts identified in the risk assessment. If necessary, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures
8.2b Biodiversity management	Not Applicable	There were no Material biodiversity impacts identified in the risk assessment.

CRITERION	RATING	COMMENT
(Consultation and mitigation hierarchy)		If necessary, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures. Issues of biodiversity are also subject to any operating permit (BlmSchG). Even though no material impact has been identified, actions were taken to prevent biodiversity impacts.
8.2c Biodiversity management (reporting)	Conformance	Even though no material impact has been identified, regular reporting process during the annual Management review and the public report of the district government.
8.3 Alien Species	Conformance	The Entity has taken preventive actions to prevent introduction of Alien Species. Packaging Material used for export materials (e.g. wooden pallets) are thermally treated (IPCC-treatment) to eliminate risk of Alien Species introduction to other regions.
8.4a Commitment to No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.4b Commitment to No Go+in World Heritage properties (existing operations)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (Policy)	Conformance	The Entity has implemented a Code of Conduct and Policies with commitment to respect Human Rights.
9.1b Human Rights Due Diligence (Process)	Conformance	The Entity has implemented a Code of Conduct including Human Rights aspects. As part of a risk assessment, the requirements of Human Rights within the Area of Influence of the Entity were examined. The focus here is the Preventive Approach to identify legal issues in advance.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified any contributed adverse Human Rights impacts.
9.2 Women's Rights	Conformance	The Entity has implemented Policies and tools to ensure women's rights are respected at any time.

CRITERION	RATING	COMMENT
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 no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. Also, 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	Up to now, no expansion of the entire plant is planned which may have impact on this ASI Criteria. However, the requirements of the ASI Performance Standard will be considered as part of new risk assessment.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The location Göttingen respects and is very sensitive to the neighborhood, the Community and all other interest groups in the vicinity of the work. An evaluation of the interested parties took place.
9.7b Local Communities (impacts)	Conformance	The Social Self Assessment (SA 8000) confirmed that there are no issues with Local Communities and therefore there is no need for action. However, the Entity prevents any adverse impacts on Local Community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Novelis group requests each of its sites to engage with Local Communities. The Entity in Göttingen regularly participates on Community events e.g. Göttinger Altstadtlauf. See press-release by following the link: <a href="https://www.hna.de/lokales/goettingen/goettingen-ort28741/firmencup-altstadtlauf-goettingen-12767681.html">https://www.hna.de/lokales/goettingen/goettingen-ort28741/firmencup-altstadtlauf-goettingen-12767681.html</a> .
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has strict Procedures to ensure it doesn't contribute in any way to Human Rights abuses in High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights.

CRITERION	RATING	COMMENT
		<p>The Entity mainly performs the security by itself, but also contracts an external security provider for gate control and plant security.</p> <p>The Entity does not employ armed security forces.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective Agreement for the metallurgy sector. Most Workers joined a Trade Union and there is an elected Workers council.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	<p>The Entity respects the local regulations on Workers' rights and applies a collective Agreement for the metallurgy sector. Most Workers joined a Trade Union and there is an elected Workers council.</p> <p>No infringement to this requirement has ever been reported (e.g. Collective Bargaining).</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity does only operate in Germany, a country that fully respects Workers rights. The Entity respects the Freedom of Association without interference.
10.2a Child Labour (minimum age)	Conformance	Entity's Policies and local regulations are in place to avoid hire of Child Labour. The Entity has a strict control over any potential Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use, nor does it support the use of Child Labour and does not engage in or support 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	The Entity does neither use, nor does it support the use of Child Labour and does not engage in or support worst forms of Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does neither engage in, nor does it 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.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in, nor does it 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.

CRITERION	RATING	COMMENT
10.3c Forced Labour (Migrant Workers)	Conformance	The Entity does neither engage in, nor does it support the use of Forced Labour. The Entity does not require Workers to lodge deposits or security payments at any time, 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 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.
10.3g 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 ensure equal opportunities and 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, marital status, family responsibilities, age, or any other condition that could give rise to discrimination.
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	The Entity does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week meet

CRITERION	RATING	COMMENT
		the industry standard, as confirmed by document review and Worker interviews. 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.
10.7b Remuneration (method of payment)	Conformance	As 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	The Entity does comply with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreements and part of each employment contract. Clocking-in System is in place. Records are on hand.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity is ISO 45001:2018 Certified by an accredited Certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated its OHS Policy as required by the ASI Performance Standard.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity has implemented and communicated its Environmental, Health & Safety Policy as required by the ASI Performance Standard. A process for the coordinating external companies and visitors has been introduced. The EHS Policy is available and well known in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	A health and safety Policy (guidelines) is in place and published. It is made accessible to all employees, visitors and suppliers (intranet / internet). The Policy includes the obligation to comply with legal requirements: <a href="https://2gjon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf">https://2gjon1sdeu33dnmvp1qwsdx-wpengine.netdna-ssl.com/wp-content/uploads/2015/12/2015-EHSQ-Policy-Guidelines-Nov-2015-ENG.pdf</a> .
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Employees are regularly briefed on the dangers at the workplace (based on the risk assessment). They have the right and obligation to report unsafe conditions and stop the work immediately if necessary.
11.2 OH&S Management System	Conformance	A health and safety Management System is in place and effectively working.
11.3 Employee engagement on health and safety	Conformance	Employees are involved in the preparation of risk assessments. The safety officers have a mandate in the regular Occupational Health and Safety committees (4 x year).

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	<p>The continuous improvement of Occupational Health and Safety performance is driven by performance indicators and the achievement of goals. Occupational safety committee meetings take place four times a year. There is a review of the numbers and the targets instead. Measures are discussed and coordinated there.</p> <p>The performance measures include lagging and leading indicator.</p>

**Document Control and Version History**

Revision	Date	Notes
0	2 October 2020	Issued (Initial Certification)