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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# KAISER ALUMINUM WARRICK LLC

CERTIFICATE  
NUMBER

129

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

PROVISIONAL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

ERM CVS

DATE OF ISSUE

14 MAY 2021

DATE OF EXPIRY

13 MAY 2022

CERTIFIED SINCE

14 MAY 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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Ingot casting centers, rolling mills and finishing  
production centers.

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# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

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## OVERVIEW

MEMBER NAME	Kaiser Aluminum Corporation
ENTITY NAME	Kaiser Aluminum Warrick LLC
CERTIFICATION SCOPE	Ingot casting centers, rolling mills and finishing production centers.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit</li></ul>
AUDIT FIRM	ERM CVS
AUDIT DATE	<ul style="list-style-type: none"><li>• 21 March 2021</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 1 April 2021</li></ul>
AUDIT SCOPE	<p>The audit scope includes ingot casting centers, rolling mills and finishing production centers.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (March 2021), 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 ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Provisional Certification</li></ul>

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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.
- 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

14 May 2021 – 13 May 2022

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

14 November 2021

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CERTIFICATE  
NUMBER

129

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to maintain awareness of and ensure compliance with applicable law. Corporate level legal compliance review and communication mechanisms are reinforced by understanding of local legal requirements.
1.2 Anti-Corruption	Conformance	The Entity has implemented policies and procedures to ensure it works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. Corporate level policies and practices are rolled out and local management of internal and external partnerships ensure due diligence and integrity through detailed compliance reporting.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles relevant to environmental, social and governance performance. The corporate level Code of Conduct is communicated locally and incorporated to essential training and contractual needs to ensure awareness and ongoing compliance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains integrated and stand-alone policies that are consistent with the environmental, social, and governance practices included in this ASI Performance Standard. The EHS Policy is adapted by the Entity to meet specific site conditions. All policies have been endorsed by senior/executive management at the corporate or the Entity level, are subject to regular review, and appropriately communicated internally and externally to all interested parties.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented and maintains integrated and stand-alone policies that are consistent with the environmental, social, and governance practices included in this ASI Performance Standard. The EHS Policy is adapted by the Entity to meet specific site conditions. All policies have been endorsed by senior/executive management at the corporate or the entity level, are subject to regular review, and appropriately communicated internally and externally to all interested parties.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has implemented and maintains integrated and stand-alone policies that are consistent with the environmental, social, and governance practices included in this ASI Performance Standard. The EHS Policy is adapted by the Entity to meet specific site conditions. All policies have been endorsed by senior/executive management at the corporate or the entity level, are subject to regular review, and appropriately communicated internally and externally to all interested parties.
2.2 Leadership	Conformance	The Entity has nominated and empowered a senior management representative with overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard, both at the corporate and the operational level.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented, implemented and maintains an integrated Environmental, Health and Safety (EHS) Management System that follows the corporate EHS Management System Standard, is based on the ISO14001 structure, and consists of all necessary elements of an effective environmental management system.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has well defined and documented processes for the management of internal and external social issues and risks across its activities. It implements and maintains such processes to identify and mitigate any social issues and is moving towards a more formalised social management system approach as part of a corporate initiative, for greater global consistency.
2.4 Responsible Sourcing	Conformance	The Entity implements a Responsible Sourcing Policy covering environmental, social and governance issues. This is done at the corporate level and rolled out across the group and a large proportion of the Entity's suppliers are now managed under specific supplier schemes in addition to assessment that takes place at the local level.
2.5 Impact Assessments	Conformance	The Entity has in place processes and procedures that would assess the environmental, social, cultural and human rights impacts, for new projects or major changes to existing facilities that may arise. This includes a Project Environment, Health and Safety Review (PEHSR) to assess the potential to impact the environment and the health or safety, and also

CRITERION	RATING	COMMENT
		local community, culture and heritage to an extent. This is supported by the need for a fuller human rights assessment that is being rolled out to all facilities, already applied at the Entity site.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity does have in place a valid Emergency Response Plan that is developed in collaboration with relevant stakeholder groups. However, there is no plan for emergency drills in place for 2021 yet, expected to be completed in April to accommodate changes and no training records were available for fire training and drills at the time of audit.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the due diligence process for mergers, acquisitions and divestments. The Entity's live divestment has followed due corporate process with site-level participation.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues in the due diligence process for mergers, acquisitions and divestments. The Entity's live divestment has followed due corporate process with site-level participation.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity, through its corporate group company, publicly discloses its governance approach and its material environmental, social and economic impacts and performance. This information is published annually in the Alcoa Sustainability Report (previous owner of the Entity at the time of the audit) that includes consolidated data from across the group: <a href="https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity, through its corporate annual financial and sustainability reporting, publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable law.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has in place processes and procedures to ensure that only payments to governments on a legal and/or contractual basis are made and that all other payments adhere to strict internal policy and approval.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented processes and procedures to ensure that stakeholder complaints, grievances, resolution and requests for information are being met and that the mechanisms for doing so are accessible, transparent, understandable and culturally and gender sensitive, where required.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity had a Life Cycle Assessment (LCA) conducted in 2020 of their Rolling Operation's 2019 average finished product, for which aluminium is considered or used, to evaluate its life cycle impacts.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity had a Life Cycle Assessment (LCA) of their Rolling Operation's average finished product, for which aluminium is considered or used, conducted in 2020 to evaluate its life cycle impacts. Upon customer request, the Entity's Sales Director provides the 2020 cradle-to-gate LCA information.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity had a Life Cycle Assessment (LCA) of their Rolling Operation's average finished product, for which Aluminium is considered or used, conducted in 2020 to evaluate its life cycle impacts. The study is made available to the public and includes its scope and underlying assumptions and limitations, including system boundaries.
4.2 Product design	Not Applicable	The Entity is not involved in material conversion and/or manufacture or sale of consumer/commercial goods containing aluminium, and therefore is not involved in the design and development process of the product or component.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has in place a strategy and approach that minimises the generation of aluminium process scrap within its own operations and, where generated, targets 100% of scrap for collection, recycling and/or re-use. All process scrap is segregated and labelled to ensure reuse is compatible and optimised.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has in place a corporate standard to establish and guide satisfactory separation of aluminium alloys and grades for recycling. All process scrap is segregated into coded groupings and labelled for coordinated reuse to ensure compatibility when remixing. Product quality depends on this process being followed closely.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has in place a strategy and approach that minimises the generation of aluminium process scrap within its own operations and, where generated, targets 100% of scrap for collection, recycling and/or re-use. All process scrap is segregated and labelled to ensure reuse is compatible and optimised. The Entity has little or no influence on consumer end-of-life scrap but is proactive in initiatives to increase collection and recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages locally and regionally through its global partnership with The Recycling Partnership, and its participation in national collection and recycling systems to support efforts to increase recycling rates for products containing aluminium. This is supplemented by other local initiatives although the Entity has limited influence over end-of-life material.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses its GHG emissions and energy use via the corporate annual sustainability reporting of Alcoa (previous owner of the Entity at the time of the audit): <a href="https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf</a> This includes a breakdown of emissions across the smelting and refining operations by CO <sub>2</sub> equivalent type, and by individual GHG source at the plant in the GEMS system for data management.
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity does not publish time-bound GHG emissions reduction targets for its own operations and instead submits data to the corporate entity for the higher level setting of corporate-based GHG reduction targets.
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 quantifies and reports its emissions to air and concludes via the US EPA that no adverse



CRITERION	RATING	COMMENT
		effects on humans or the environment exist from its operations, so therefore does not implement plans to minimise any such adverse impacts.
6.2 Discharges to Water	Conformance	The Entity does, and is regulatory required under their regulatory authority to, quantify and report discharges to water that have adverse effects on humans or the environment, and implement plans to minimize these adverse impacts.
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	The Entity does, and is regulatory required under their regulatory authority to, conduct an assessment of major risk areas of operations where spills and leakage may contaminate air, water and/or soil. This will be confirmed during the on-site audit.
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	The Entity does, and is regulatory required under their regulatory authority to, have external communication plans, compliance controls and a monitoring programme in place to prevent and detect spills and leakage, and management is notified if an incident were to occur. This will be confirmed during the on-site audit.
6.4a Reporting of Spills (immediate disclosure)	Unable to Rate	The Entity does, and is regulatory required under their regulatory authority to, disclose to affected parties the volume, type and potential impact of significant spills immediately after an incident. This will be confirmed during the on-site audit.
6.4b Reporting of Spills (regular reporting)	Unable to Rate	The Entity does, and is regulatory required under their regulatory authority to, disclose impact assessments of spills and remediation actions taken, and reports publicly on an annual basis in their Annual Corporate Sustainability Report. This will be confirmed during the on-site audit.
6.5a Waste management and reporting (strategy)	Unable to Rate	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The Warrick Waste Inventory Survey is used to identify opportunities for waste mitigation and minimization, based on the Waste Management (i.e. mitigation) Hierarchy. The Entity is also required under state waste regulation to implement a waste minimization program, enforced through annual regulatory audits. This will be confirmed during the on-site audit.
6.5b Waste management and reporting (disclosure)	Unable to Rate	The Entity does, and is regulatory required under their regulatory authority to disclose, on an annual basis, the quantity of hazardous and non-

CRITERION	RATING	COMMENT
		hazardous waste generated by the Entity, and associated waste disposal methods, and reports publicly on an annual basis in their Annual Corporate Sustainability Report. This will be confirmed during the on-site audit.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of aluminium by treatment of dross and dross residues through implementation of the corporate Management and Disposal of Dross and Dross Residues Standard for onsite management of dross, transportation of dross, selection of dross processors, and management of dross residues. The Entity uses a third party for recovery and to monitor the recovery yield.
6.8b Dross (recycling)	Conformance	The Entity maximizes the recycling of aluminium by treatment of dross and dross residues through implementation of the corporate Management and

CRITERION	RATING	COMMENT
		Disposal of Dross and Dross Residues Standard for onsite management of dross, transportation of dross, selection of dross processors, and management of dross residues. The Entity uses a third party for recovery, recycling and to monitor the overall recovery yield.
6.8c Dross (review of alternatives)	Conformance	The Entity demonstrated that it reviews alternative options to landfilling of its dross residues. It currently does landfill the dross but investigations of alternative treatments indicated no technologies or other methods to be currently available in the US that would provide a more suitable solution to date. The results were supported by the Aluminium Association which provides global standards, industry statistics and expert knowledge to member companies and policy makers in the United States.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water withdrawal and is required under regulatory authority to do so by source and type. It applies the corporate Water and Wastewater Management framework to ensure sustainable management and protection of water resources and ecosystems in and around its environs and adopts a catchment-based approach for this.
7.1b Water assessment (risk assessment)	Conformance	The Entity does, and is regulatory required under their regulatory authority to, assess water-related risks in watersheds in the Entity's area of influence.
7.2a Water management (management plans)	Unable to Rate	The site indicated the Water Risk Assessment identified no material risks. This will be confirmed during the on-site audit.
7.2b Water management (monitoring)	Unable to Rate	The site-based Water Risk Assessment identified no material risks and therefore no plans were applicable. This will be confirmed during the on-site audit.
7.3 Disclosure of water usage and risks	Conformance	The Entity does, and is regulatory required under their regulatory authority to, report water withdrawal and use and disclose material water-related risks, and reports publicly on an annual basis in their Annual Corporate Sustainability Report (previous owner of the Entity at the time of the audit): <a href="https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-sustainability-report.pdf</a>
PRINCIPLE 8 BIODIVERSITY		

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's area of influence. It applied the previous Entity owner's (Alcoa) corporate biodiversity framework for this purpose that uses a mitigation hierarchy of avoidance, minimization, mitigation and offset to manage any identified material risk to biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's Biodiversity Risk Assessment identified no material impacts however, the Entity has implemented a Biodiversity Action Plan and monitors its effectiveness for non-material impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity Action Plan is consultative and designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The Entity does share achieved biodiversity outcomes with stakeholders, made publicly available, and periodically updated on an annual basis in their Annual Corporate Sustainability Report.
8.3 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of alien species that could have significant adverse impacts on biodiversity. It has conducted a Biodiversity Risk Assessment of its Rolling Mill Facility to assess the risk and materiality of the impacts on biodiversity from the land use and activities in its area of influence. This has determined that activities do not deliberately introduce alien species and that there are no known negative impacts on biodiversity.
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.

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including: a policy commitment to respect human rights; a due diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights; and as such impacts are identified, provides for remediation through legitimate processes.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including: a policy commitment to respect human rights; a due diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights; and as such impacts are identified, provides for remediation through legitimate processes.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including: a policy commitment to respect human rights; a due diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights; and as such impacts are identified, provides for remediation through legitimate processes.
9.2 Women's Rights	Conformance	The Entity does implement policies and processes to ensure respect for the rights and interests of women that are consistent with international standards, including ILO conventions, UNGP, UN CEDAW and other frameworks. The policies are enforced through the business with regular reporting required against established improvement KPIs.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples associated with the plant and therefore there is no need for a specific policy or processes to address the needs of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples associated with the plant and therefore there is no need for a specific policy or processes to address the needs of Indigenous Peoples.
9.5 Cultural and sacred heritage	Not Applicable	The Alcoa (previous owner of the Entity at the time of the audit) Human Rights Policy states that: 'We recognize and respect the diversity, cultures, customs and values of the people in communities where we operate and take into account their

CRITERION	RATING	COMMENT
		needs, concerns and aspirations regarding their heritage and traditions.' However, the plant occupies a fixed site that does not have sacred or cultural heritage implications within its boundaries. It is understood that the closest site of sacred or cultural interest is Angel Mounds at a distance of seven miles from the plant.
9.6a Resettlements (avoid or minimise)	Not Applicable	There has been no physical and/or economic displacement resulting from the establishment of the plant and therefore no need to consider feasible alternatives to avoid or minimise physical and/or economic displacement.
9.6b Resettlements (where unavoidable)	Not Applicable	There has been no physical and/or economic displacement resulting from the establishment of the plant and therefore no need to develop a Resettlement Action Plan.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects legal and customary rights and interests of local communities in their lands and livelihoods and their use of natural resources. There is a corporate engagement process followed by the Entity, strengthened by the Community and Advisory Board, and customised to serve the interests of its local and regional stakeholders.
9.7b Local Communities (impacts)	Conformance	The Entity respects legal and customary rights and interests of local communities in their lands and livelihoods and their use of natural resources. There is a corporate engagement process followed by the Entity, strengthened by the Community and Advisory Board, and customised to serve the interests of its local and regional stakeholders.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with local communities the opportunities to respect and support their livelihoods. There is a corporate engagement process followed by the Entity, strengthened by the Community and Advisory Board, and customised to serve the interests of its local and regional stakeholders.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity's corporate structure has in place policies and processes to avoid any contribution to armed conflict or human rights abuses in conflict-affected and high-risk areas through management of its supply chain, both at the corporate and local level. The Entity plant is not located in a conflict-affected and high-risk area and follows all appropriate corporate and additional local

CRITERION	RATING	COMMENT
		processes - see Criterion 2.4 for more detail on responsible sourcing.
9.9 Security practice	Not Applicable	The Entity does not employ public or private security providers and this service is in-house staffed by full-time Kaiser employees that are subject to the same code, policy and induction training as other staff that respect human rights in line with recognised standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	The Entity respects the rights of Workers to associate freely in labour unions, seek representation and join workers' councils without interference to the extent possible under applicable law, in line with the ILO Conventions C87 and C98. It is governed in this by national and state law, and corporate guidance. This will be confirmed during the on-site audit.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	The Entity respects the rights of Workers to collective bargaining, to participate in any collective bargaining process in good faith to the extent possible under applicable law and adhere to collective bargaining agreements where such agreements exist. A labour contract for workers in the form of a collective bargaining agreement (CBA) is negotiated between the Entity and the union, and Indiana is now a 'right to work' state which provides that no employer, labour organization or any person may require an individual to become or remain a member of a labour organization. This will be confirmed during the on-site audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Applicable law in the Entity's country does not restrict the right to freedom of association and collective bargaining, and would support alternative means of association for workers that are permitted under applicable law, where this may be required. This will be confirmed during the on-site audit.
10.2a Child Labour (minimum age)	Unable to Rate	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law in this regard. Its onboarding process is strictly controlled by a government mandated database and a minimum working age of 18 years is adhered to, to ensure no contact of young employees with hazardous materials. This will be confirmed during the on-site audit.



CRITERION	RATING	COMMENT
10.2b Child Labour (hazardous)	Unable to Rate	The Entity has in place policies and procedures that prevent the use or support of Child Labour as defined in ILO Conventions C138 and C182. There is a process in place to comply with related national and international law including: not engaging in or supporting hazardous child labour, or worst forms of child labour. This will be confirmed during the on-site audit.
10.2c Child Labour (worst forms)	Unable to Rate	The Entity does not use nor support Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law in this regard. Its onboarding process is strictly controlled by a government mandated database and a minimum working age of 18 years is adhered to ensure no contact of young employees with hazardous materials. There is a process in place to comply with related national and international law including: not engaging in or supporting hazardous child labour or worst forms of child labour. This will be confirmed during the on-site audit.
10.3a Forced Labour (human trafficking)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibits forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3c Forced Labour (migrant workers)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention,



CRITERION	RATING	COMMENT
		and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3d Forced Labour (debt bondage)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3e Forced Labour (freedom of movement)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29,

CRITERION	RATING	COMMENT
		<p>along with Protocol P29 (2014) to this Convention, and C105. There is a corporate Human Rights Policy and Code of Conduct that prohibit forced labour and locally implemented processes that reduce the risk of engaging in or supporting forms of forced labour including human trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty. This will be confirmed during the on-site audit.</p>
10.4 Non-Discrimination	Unable to Rate	<p>The Entity has in place processes that ensure equal opportunities and that there is no engagement or support of discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, age. Corporate policies on equal employment opportunities, human rights and the code of (ethical) conduct are reinforced at the local level by the Collective Bargaining Agreement in place. This will be confirmed during the on-site audit.</p>
10.5 Communication and engagement	Unable to Rate	<p>The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues. This is done through a number of mechanisms that ensure there is no threat of reprisal, intimidation or harassment. This will be confirmed during the on-site audit.</p>
10.6 Disciplinary practices	Unable to Rate	<p>The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers. There are a number of corporate-based and local mechanisms across the workforce to ensure this. This will be confirmed during the on-site audit.</p>
10.7a Remuneration (living wage)	Unable to Rate	<p>The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week shall always meet at least a legal or industry minimum standard. The wages paid are seen to be in excess of the US national minimum wage, sufficient to meet the basic needs of workers and to provide some discretionary income. This will be confirmed during the on-site audit.</p>
10.7b Remuneration (method of payment)	Unable to Rate	<p>The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal</p>

CRITERION	RATING	COMMENT
		working week shall always meet at least a legal or industry minimum standard. The wages paid are seen to be in excess of the US national minimum wage, sufficient to meet the basic needs of workers and to provide some discretionary income. Payments are timely, in legal tender and fully documented. This will be confirmed during the on-site audit.
10.8 Working Time	Unable to Rate	The Entity has in place policies and processes to comply with applicable law and industry standards on working time (including overtime working hours), public holidays and paid annual leave. The Entity has in place a Collective Bargaining Agreement (CBA) negotiated with employees via union representation and reviewed on a regular basis to ensure workers are protected in terms of working hours, including overtime, public holidays and paid annual leave. The average standard plus overtime week being worked for year to date was seen to be approximately 51 hours which is well below the maximum working week of 72 hours agreed in the CBA, negotiated on the employee-side for the economic benefit of overtime payment. This will be confirmed during the on-site audit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented and communicates and regularly reviews their Occupational Health and Safety Policy that senior management has endorsed and supports through provision of resources.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies the Occupational Health and Safety Policy to all Workers and Visitors present in any area or activities under their control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy includes a commitment to comply with all applicable environmental, health and safety laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity includes that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work in the Entity's policies, procedures, and/or trainings.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is routinely

CRITERION	RATING	COMMENT
		independently audited for conformance with applicable national and international standards.
11.3 Employee engagement on health and safety	Unable to Rate	The Entity provides Workers with a mechanism by which they can raise, discuss and participate in the resolution of occupational health and safety issues with management, as prescribed in the Collective Bargaining Agreement. This will be confirmed during the on-site audit.
11.4 OH&S performance	Conformance	The Entity does evaluate its occupational health and safety performance using lagging and leading indicators, compare this with peers and best practices where available, and strive to continuously improve.

#### **Document Control and Version History**

Revision	Date	Notes
0	14 May 2021	Initial Certification Audit – Provisional Certification