
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NORÐURÁL GRUNDARTANGI

CERTIFICATE
NUMBER

66

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

10 JANUARY 2020

DATE OF EXPIRY

9 JANUARY 2023

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over 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

CERTIFICATION SCOPE

Production of aluminium and aluminium alloy
ingots at Norðurál Grundartangi (Iceland) and
the central functions at Head Office in Chicago
(USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Century Aluminum Company
ENTITY NAME	Norðurál Grundartangi
CERTIFICATION SCOPE	Production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (26 – 28 August 2019)Surveillance Audit and Scope Change (18 May – 4 June 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">26 – 28 August 2019 (Initial Certification Audit)18 May – 4 June 2021 (Surveillance Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 October 2019 (Initial Certification Audit)9 August 2021 (Surveillance Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (26 – 28 August 2019)</u></p> <p>The audit scope included the production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p> <p><u>Surveillance Audit and Scope Change (18 May – 4 June 2021)</u></p> <p>The audit scope included the production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA).</p>

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

At the time of the audit (May – June 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 the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

10 January 2020 to 9 January 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DATE

9 January 2023

CERTIFICATION
NUMBER

66

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has systems in place to maintain awareness of and ensure compliance with applicable laws. This includes the use of external consultants that provide advisory services to the Entity about applicable laws.</p> <p>A formal process to follow up and report on legal compliance through a yearly management review is in place.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. An Anti-Corruption Policy is in place and annually signed by management and specialists. Every year the Entity review policies and approve any changes. The policy is available on the web:</p> <p>https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Anti-Corruption-Policy-and-Business-Courtesy-Guidelines-Q3-2020.pdf</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct practice through their Mission, Vision and Values statement. The Mission, Vision and Values includes principles relevant to environmental, social and governance performance. At group level a Code of Ethics statement is implemented and rolled out to all employees. The Code of Ethics is available on the web:</p> <p>https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintained, at relevant levels in the organisation, Environmental, Social and Governance Policies. All policies are available on the company website:</p> <p>https://centuryaluminum.com/investors/governance/governance-documents/default.aspx</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The policies and procedures are reviewed and updated on a regular basis. All policies have senior management approval and are regularly reviewed and updated in the Management Review. Senior Management and Board regularly review, at least once a year, and update the corporate policy statements for the entire group. Please see:</p>

CRITERION	RATING	COMMENT
		https://centuryaluminum.com/investors/governance/governance-documents/default.aspx
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity is communicating the Environmental, Social, and Governance Policies internally, and externally as appropriate.</p> <p>Internally on the company intranet, in the management system and on display boards.</p> <p>Externally the policies are provided upon request and available on the web:</p> <p>https://nordural.is/en/quality/</p> <p>Group policies are all published and available on the web:</p> <p>https://centuryaluminum.com/investors/governance/governance-documents/default.aspx</p>
2.2 Leadership	Conformance	At the Nordural Plant in Iceland, the Safety and Environmental Manager has overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. For the Century Aluminium Group, the General Counsel have responsibility and have nominated the Senior Vice President Strategy and Business Development to this role.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System and is ISO 14001:2015 certified at the Nordural site in Iceland. On a group level, Century Aluminum abides by all applicable environmental laws and regulations.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Social Management System integrated with quality, environmental and safety management systems.
2.4 Responsible Sourcing	Conformance	<p>The Entity maintains a Code of Ethics for Suppliers and Business Partners, available on the website:</p> <p>https://s23.q4cdn.com/963478445/files/doc_downloads/governance/2021/Supplier-Code-of-Conduct-(Final-Rev-4.21.2021).pdf</p>
2.5 Impact Assessments	Not Applicable	The Entity has not executed any major projects or changes to existing facilities during the last years. The Entity has procedures in place to conduct environmental, health and safety impact assessments when performing major changes and capital investments.
2.6 Emergency Response Plan	Conformance	The Entity has emergency response and evacuation plans developed in collaboration with potentially affected stakeholder groups such as communities,

CRITERION	RATING	COMMENT
		workers and their representatives, landlords and relevant agencies.
2.7 Mergers and Acquisitions	Conformance	No mergers and acquisitions have occurred in the past 5-10 years. The Entity will review environmental, social and governance issues in the due diligence process if mergers and acquisitions occur.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. This is in compliance with local laws.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and its material environmental, social and economic impacts.</p> <p>The reporting is accessible for instance through the Entity's web pages: https://nordural.is/en/environment-and-society/ and https://nordural.is/en/article/green-accounting/</p> <p>The group has for the first time published an annual Sustainability Report 2020: https://s23.q4cdn.com/963478445/files/doc_downloads/2021/Century_Aluminum_2020_Sustainability_Report_Delivering_a_Sustainable_Future.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity is a publicly reporting company in the United States and must report any such liabilities in its Exchange Act filings. This is publicly disclosed in the annual Financial Report (page 20): https://s23.q4cdn.com/963478445/files/doc_financials/2020/ar/CENX-2020-10-K.pdf</p> <p>Also, in the environmental reporting (page 14 - 15), the Entity is disclosing information on complying with applicable laws: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has not, or on its behalf, made payments to governments on a legal and/or contractual basis. This is disclosed in the financial annual report. The Entity's management have committed to follow all applicable laws and ethical principles. The conclusion is confirmed by the financial auditor: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf</p>

CRITERION	RATING	COMMENT
		The same applies at group level and head office. The Century Aluminum Company pays legal and obligatory payments related to taxes and duties. More information on tax obligations can be found in the annual Financial Report: https://s23.q4cdn.com/963478445/files/doc_financials/2020/ar/CENX-2020-10-K.pdf
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented Complaints Resolution Mechanisms procedures, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. The following websites are established: United States or the Netherlands: https://century.ethicaladvocate.com/ Iceland: https://nordural.ethicaladvocate.com/ Reports made through this system will be directed to the General Counsel unless the report concerns the General Counsel in which case the reports will be directed to the Chairman of the Audit Committee.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity publicly disclose environmental impact studies and a green accounting report which is independently verified by auditors. A study and report on a cradle to gate Life Cycle Assessment has been prepared which complies with the requirements of ISO Standards 14040:2006 and 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity will provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products. Cradle to gate LCA and carbon footprint information is available in short summary for some products and published on the web: https://nordural.is/natur-al/
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity is publishing environmental Life Cycle Assessments on product level in a LCA Study. Environmental performance and a low carbon product claim is published on the web: https://nordural.is/natur-al/ and https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf

CRITERION	RATING	COMMENT
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies minimizing Process Scrap. Targets on reducing waste and scrap supporting a circular economy thinking are well established. All Process Scrap is recirculated on site and the production system gives the needed structure and traceability for separating aluminium alloys and grades for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. All Process Scrap is recirculated on site and the production system gives the needed structure and traceability for separating aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	As a member of Samal, the Aluminum Producers Association in Iceland and the European Aluminium Association, the Entity is involved and engaged in local, regional and national activities promoting collecting and recycling systems to increase recycling rates. However, the Entity needs to document their recycling strategy with timelines, activities and targets for products at end of life both on site and group level. A positioning document is available pointing out work on a concrete recycling strategy to be finalized during 2021.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity promotes end-of-life recycling through local and national activities. As a member of Samal, the Aluminum Producers' Association in Iceland, the Entity is involved and engaged in local, regional and national activities promoting collecting and recycling systems to increase recycling rates. Please see: http://www.samal.is/is/ On group level a recycling strategy road map is available, pointing out work on partnerships and programs to collect and recycle aluminium at end of life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity discloses GHG emissions and energy use in their annual Green Accounting Report (page 7 and 11): https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf

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		and Sustainability Report: https://s23.q4cdn.com/963478445/files/doc_downloads/2021/Century_Aluminum_2020_Sustainability_Report_Delivering_a_Sustainable_Future.pdf However, the public disclosure of GHG emissions and energy use is not fully reported by source.
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has published a Sustainability Report addressing GHG emissions and actions to reduce the emissions: https://s23.q4cdn.com/963478445/files/doc_downloads/2021/Century_Aluminum_2020_Sustainability_Report_Delivering_a_Sustainable_Future.pdf However, the Entity's climate action plan is not covering the material sources of GHG emissions with time-bound targets and actions to reduce the emissions.
5.3a Aluminium Smelting (management system)	Conformance	The Entity has an environmental management system in place ensuring operation controls to limit direct GHG emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity can demonstrate average direct and indirect emissions is far below the 8 tonnes CO ₂ -eq per metric tonnes Aluminium target.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity has no plans for 2020 or later on starting up new production capacity.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has systems and procedures to report on emissions to air to national authorities and internally. Plans are in place to minimize the impact of emissions to air. The Nordural performance is presented in the annual Green Accounting Report available on the web: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020.pdf The Century Aluminum 2020 Sustainability Report, Delivering a Sustainable Future, is available on the web: https://s23.q4cdn.com/963478445/files/doc_downloads/2021/Century_Aluminum_2020_Sustainability_Report_Delivering_a_Sustainable_Future
6.2 Discharges to Water	Conformance	The Entity has systems and procedures to report on emissions discharges to water national authorities and internally. Plans are in place to minimize the impact of discharge to water.

CRITERION	RATING	COMMENT
		<p>The Nordural performance is presented in the annual Green Accounting Report available on the web: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf</p> <p>The Century Aluminum 2020 Sustainability Report, Delivering a Sustainable Future, is available on the web: https://s23.q4cdn.com/963478445/files/doc_downloads/2021/Century_Aluminum_2020_Sustainability_Report_Delivering_a_Sustainable_Future</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity's Nordural Smelter is ISO 14001 certified and regularly assesses major risks related to environmental aspects, potential spills and leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity's Nordural Smelter has a management and external communication plan, compliance controls and a monitoring programme in place to prevent and detect spills and leakage. Nordural Smelter is ISO 14001 certified and operation procedures and preventive maintenance ensure control and reduction of potential risks identified. The emergency organisation, including rescue staff, is trained regularly. Management and external communication plans are implemented.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's Nordural Smelter has systems to report and communicate to affected parties about potential impacts of significant spills. Emergency response plans are established and regularly reviewed and tested.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Nordural Smelter has systems and a reporting culture in place to address and disclose potential significant spills on an annual basis in their Green Accounting Report (page 8): https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management strategy focusing on waste mitigation, recycling and reuse. In the Nordural Smelter's Operational Permit it is clearly stated how to manage waste. It is accessible on Icelandic Environmental Agency's webpage.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's Nordural Smelter publicly disclose the waste generation and disposals in the annual Green Accounting Report (page 8 – 9):

CRITERION	RATING	COMMENT
		https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf
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)	Minor Non-Conformance	Due to flood pit disposal practice of Spent Pot Line (SPL) at the Nordural Smelter the Entity is not fully in compliance with the requirement to prevent leachate to the environment. Flood pit disposal is so far, the best practice for treating SPL in Iceland, and complies with the operational license approved by the Icelandic Environmental Agency.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Minor Non-Conformance	The Entity's Nordural Smelter is not in compliance with the requirement to optimise processes for recovery and recycling carbon and refractory material from SPL due to flood pit disposal practise of untreated SPL. Flood pit disposal practise of SPL is in compliance with the operational license.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	The Entity's Nordural Smelter is not landfilling untreated SPL but using a flood pit disposal method where the SPL is treated /mixed with shell sand to neutralize before placed in the flood pit.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity's Nordural Smelter reviews alternative options to flood pit disposal and methods coming up are evaluated and compared with the flood pit method.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Minor Non-Conformance	Due to flood pit disposal practise of untreated SPL the Entity's Nordural Smelter is not in compliance with the requirement to not discharge SPL to marine or aquatic environments.

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		The flood pit disposal practise of SPL is in compliance with the operational license.
6.8a Dross (recovery)	Conformance	At the Entity's Nordural Smelter the dross is processing on site and the aluminium recovered is recycled in the plant casthouse. Furthermore, the dross is treated at a recycling company and the aluminium recovered is recycled in the plant casthouse.
6.8b Dross (recycling)	Conformance	At the Entity's Nordural Smelter the dross is processing on site and the aluminium recovered is recycled in the plant casthouse. Furthermore, the dross is treated at a recycling company and the aluminium recovered is recycled in the plant casthouse.
6.8c Dross (review of alternatives)	Not Applicable	At the Entity's Nordural Smelter recovers aluminium from dross and no dross is landfilled. The dross is processing on site and the aluminium recovered is recycled in the plant casthouse. Furthermore, the dross is treated at a recycling company and the aluminium recovered is recycled in the plant casthouse.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type. Freshwater is from a controlled water supply utility that has an operational licence from the Health Authority. The fresh and seawater usage is monitored and reported in the Nordural Green Accounting Report (on page 7): https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf
7.1b Water assessment (risk assessment)	Conformance	The Entity is assessing water-related risks related to operational, internal and external risk in their area of influence. There are no identified material water related risks since there is an abundance of water in the region of Iceland. The water used by the Entity is flowing from the mountains to the sea. The environmental impact assessment, required by law in Iceland, was done prior to building the facility. That covers water related risks and biodiversity risks for the industrial area where the plant is located, including the ocean and local fjord Hvalfjörður, and harbour.

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7.2a Water management (management plans)	Not Applicable	No material water related risks have been identified since there is an abundance of water in the region of Iceland. The water used by the Entity is flowing from the mountains to the sea.
7.2b Water management (monitoring)	Not Applicable	No material water related risks have been identified since there is an abundance of water in the region of Iceland. The water used by the Entity is flowing from the mountains to the sea.
7.3 Disclosure of water usage and risks	Conformance	The Entity discloses water withdrawal and use in their Green Accounting Report: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf There are no water related risk identified for the Entity, since there is an abundance of water in the region of Iceland. The water used by the Entity is flowing from the mountains to the sea.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's area of influence. The biodiversity mitigation hierarchy is implemented in the methodology used. A yearly environmental monitoring programme in the area where the Entity is located is utilised by companies in the same region. The environmental monitoring is carried out according to an environmental monitoring plan 2018-2028. Its purpose is to assess the environmental impact of activities in the industrial area. Measurements of air quality, fresh water, the environment of seawater pits, hay, vegetation and grasses are performed. The monitoring program is based on a biodiversity risk mapping including both land use and activities in area of influence. The Environmental impact assessment, required by law in Iceland, was done prior to building the facility. That covers water related risks and biodiversity risks for the industrial area where the plant is located, including for example the ocean and local fjord Hvalfjörður, and harbour.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The biodiversity action plans are designed in accordance with biodiversity challenges and showing where to monitor, what to monitor and when and how often, built on risk identification from environmental impact.

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8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has a biodiversity action plan that is consultative and designed in accordance with the biodiversity mitigation hierarchy.</p> <p>Environmental monitoring is carried out according to the environmental monitoring plan 2018-2028. Its purpose is to assess the environmental impact of activities in the industrial area. Measurements of air quality, fresh water, the environment of seawater pits, hay, vegetation and grasses are performed. The monitoring program is based on a biodiversity risk mapping including both land use and activities in area of influence.</p> <p>There are open discussions with local neighbours on issues relating to biodiversity (neighbourhood dialogue meetings where also the environmental national authority participate).</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity is reporting on biodiversity issues to stakeholders in the Annual Report (page 22): https://nordural.is/wp-content/uploads/2021/06/Nordural-Grundartangi-ehf.-Annual-report-2020.pdf</p>
8.3 Alien Species	Conformance	<p>The Entity has implemented a procedure and trained personnel to proactively prevent accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. This is in compliance with Icelandic law no. 60/2013 on Wildlife Conservation, including the import of Alien Species.</p>
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
8.5a Mine rehabilitation (best available techniques)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
8.5b Mine rehabilitation (financial provisions)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has developed, implemented and communicated a Human Rights Policy expressing a commitment to respect Human Rights. This is communicated through an equality policy emphasizes the equal rights of employees to</p>

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		careers, wages and rights, regardless of gender, sexual orientation, religion or origin.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity respects Human Rights and are continuously observing Human Rights related issues and are responding to it. However, the Entity has not developed a due diligence process that also covers potential human rights impact assessment in a broader view and in its area of influence.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity complies with National law on Human Rights. No breaches of Human Rights are reported to be followed up.
9.2 Women's Rights	Conformance	The Entity has implemented an equal right and equal pay policy. A local regulation is implemented about equal rights for women and men, including Equal Pay. A specific commitment to respect the rights of women is addressed in the Human Rights Policy: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/2021/Human-Rights-Policy-CAC-(Final-Rev.-4.21.2021).pdf
9.3 Indigenous Peoples	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates. There are no Indigenous Peoples present.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates. There are no Indigenous Peoples present.
9.5 Cultural and sacred heritage	Not Applicable	There are no identified sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity is situated on land that is defined as an industrial site. No activities related to resettlements is applicable in the certification period.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity is situated on land that is defined as an industrial site and no residential area is close to the site. No activities related to resettlements is applicable in the certification period.
9.7a Local Communities (rights and interests)	Conformance	The Entity demonstrates respect to legal and customary rights and interests of local communities. A special focus on environmental monitoring in the surroundings is established and also regular community open meetings are arranged. The environmental monitoring report is of special interest

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		<p>for the local community and is presented at a yearly meeting. Please see: https://ust.is/library/Skrar/Atvinnulif/Starfsleyfi/Maelingar/2434-161-SKU-001-v02-Umhverfisv%C3%B6ktun%202020.pdf and https://ust.is/umhverfisstofnun/frettir/stok-frett/2021/05/20/Kynningarfundur-vegna-starfsleyfa-Nordurals-Elkem-Island-og-Als-alvinnslu/ The program "All Aboard" is an extensive health and safety program involving all staff members and aims to improve company safety culture and increase awareness of key safety issues. This is important as a significant number of the company's employees and suppliers have their livelihood in the local community near the plant: https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf Every year the Entity supports various kinds of community projects. Applications for a community grant could be submitted: https://nordural.is/article/large-and-small-community-projects/</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity participates in a yearly environmental monitoring program covering the local community and the impacts. The results are published and a yearly open community meeting is arranged to discuss the findings. Please see: https://ust.is/umhverfisstofnun/frettir/stok-frett/2021/05/20/Kynningarfundur-vegna-starfsleyfa-Nordurals-Elkem-Island-og-Als-alvinnslu/</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity demonstrates respect to legal and customary rights and interests of local communities. A special focus on environmental monitoring in the surroundings is established and also regular community open meetings are arranged. Please see: https://ust.is/umhverfisstofnun/frettir/stok-frett/2021/05/20/Kynningarfundur-vegna-starfsleyfa-Nordurals-Elkem-Island-og-Als-alvinnslu/ and https://nordural.is/wp-content/uploads/2021/05/Green-accounting-2020..pdf and https://nordural.is/article/large-and-small-community-projects/ The Entity supports different activities with the local community for example as a primary sponsor for the</p>

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		local soccer team and a major soccer tournament for 6-7 year old kids, among other things.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not contributing to armed conflict or human rights abuses in their area of influence.
9.9 Security practice	Conformance	The Entity only hires security providers that are generally accepted in the community and respect human rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There are 5 unions that are bargaining and make a written agreement with the Entity's management in Iceland. The agreement is valid for 5 years and is regularly followed up and discussed. At the Head Office in US currently no employees are member of unions.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There are 5 unions that are bargaining and make a written agreement with the Entity management. The agreement is valid for 5 years and is regularly followed up and discussed.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	There is strong regulation in the country where the Entity operates to respect Freedom of Association and Rights to Collective Bargaining. There is no need of alternative means in this respect.
10.2a Child Labour (minimum age)	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in the Workplace, including Child Labour, and the European Convention on Human Rights. This is expressed in the Entity's Human Rights Policy as well: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/2021/Human-Rights-Policy-CAC-(Final-Rev.-4.21.2021).pdf
10.2b Child Labour (hazardous)	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in the Workplace, including Child Labour, and the European Convention on Human Rights.
10.2c Child Labour (worst forms)	Conformance	The Entity is not hiring people under the age of 18 and complies to local laws on Health and Safety Conditions in the Workplace, including Child Labour,

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		and the European Convention on Human Rights and by applicable federal and state laws relating to child labour.
10.3a Forced Labour (human trafficking)	Conformance	The local regulation restricts forced labour and Human Trafficking. No episodes or suspicion on Human Trafficking were observed during the audits at site or discussions with senior management.
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity's sites. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity's sites. No migrant workers are hired.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity's sites. Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	No original identity papers are kept by the Entity.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Conditions of termination of working contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	No discrimination was found during audits and interviews at the Entity's sites. The Entity has developed and implemented an Equality Policy addressing zero tolerance to discrimination and a Code of Conduct: https://s23.g4cdn.com/963478445/files/doc_downloads/governance/2021/Human-Rights-Policy-CAC-(Final-Rev.-4.21.2021).pdf and https://s23.g4cdn.com/963478445/files/doc_downloads/governance/174.pdf
10.5 Communication and engagement	Conformance	Workers unions have regular meetings with management representatives to discuss the collective agreement and issues that arise.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity's sites. The Entity has implemented policies dealing with harassment and bullying. An information brochure is developed and distributed to all employees. The Entity's Code of Ethics is very clear on these issues and regularly training is performed:

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		https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf
10.7a Remuneration (living wage)	Conformance	The Entity pays wages according to agreements with appropriate Labour Unions. The workers interviewed expressed satisfaction with the wages paid by the Entity.
10.7b Remuneration (method of payment)	Conformance	Payment of wages are conducted monthly in a punctual manner and fully documented. All workers receive payslips with payments details.
10.8 Working Time	Conformance	Different shift models are in place in the Entity. These are approved by collective agreements and local authorities. The Entity follows very closely and has good systems in place to watch overtime use. Public holidays and annual leave are paid according to local laws.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed, implemented and communicated a Health, Safety and Sustainability Policy endorsed and supported by senior management through provision of resources. The Entity's management demonstrate very strong commitment related to health, safety and sustainability.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health, Safety and Sustainability Policy is communicated in several ways (on boards and through training and contracts with external stakeholders). A health and safety program, called "All on Board", includes all employees, contractors, and visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Health, Safety and Sustainability Policy addresses the importance that safe work always is the most important and a commitment to comply with all applicable laws.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Health, Safety and Sustainability Policy addresses the importance that safe work always is the most important and a safety program, called "All on Board", supports the important work on building a strong safety culture. In this, stopping work if it's not safe, is a pre-requisite.
11.2 OH&S Management System	Conformance	The Entity has documented and implemented an Occupational Health and Safety Management System that is conformant with applicable national and international standards.

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		Nordural, the Smelter Plant in Iceland is ISO 45001 certified.
11.3 Employee engagement on health and safety	Conformance	The Entity is following best industry practice on occupational health and safety having close cooperation between management and employees. The "All on Board" safety program is focusing on safety and the importance of feedback.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety (OH&S) performance regularly and several KPI's are addressed on OH&S. The Entity has several tools for evaluating performance and continuous improvement.

Document Control and Version History

Revision	Date	Notes
0	14 August 2019	Initial Certification Audit – Full Certification
1	26 August 2021	Surveillance Audit and Scope Change; Updated Member Name following change to ASI membership from Norðurál - Century Aluminum Company; Updated Audit Scope for Initial Certification Audit for completeness.