
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMINIUM GmbH NACHRODT

CERTIFICATE
NUMBER

107

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

5 JANUARY 2021

DATE OF EXPIRY

4 JANUARY 2022

CERTIFIED SINCE

5 JANUARY 2021

AUTHORISED BY

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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 extrusion billets from recycled
aluminium scrap.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Alu Met GmbH (Austria)
ENTITY NAME	Aluminium GmbH Nachrodt
CERTIFICATION SCOPE	Production of extrusion billets from recycled aluminium scrap.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (9 – 11 November 2020)Surveillance Audit (10 – 11 May 2021)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">9 – 11 November 2020 (Initial Certification Audit)10 – 11 May 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2020 (Initial Certification Audit)14 June 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 11 November 2020)</u></p> <p>Production of extrusion billets from recycled aluminium scrap at the Scrap Remelting / Casthouse.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the time of the audit (November 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p> <p><u>Surveillance Audit (10 – 11 May 2021)</u></p>

Production of extrusion billets from recycled aluminium scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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

At the time of the audit (May 2021), access to the site was limited, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and on-site observations for relevant criteria.

AUDIT
OUTCOME

- Provisional 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

5 January 2021 - 4 January 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

4 January 2022

CERTIFICATE
NUMBER

107

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The General Manager takes overall responsibility for legal compliance. There are systems in place (e.g. a legal database and qualified legal advisers) to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001 and ISO 50001 certificates from an accredited certification body to ensure compliance with applicable law.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has issued an anti-corruption guideline and communicated it internally and externally, available at the parent company's website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Antikorrption.pdf</p> <p>The financial system is annually audited by an external tax auditor.</p> <p>The Entity is not directly active on the market but all purchasing and sales of metals is done by parent company ALU-MET. Annual financial audits (conducted by licensed external tax auditor) demonstrate correct financial behaviour of the Entity.</p> <p>Transparency International's "Corruption Perceptions Index 2019" of Germany, where the Entity is located, is 80 (Rank 9).</p>
1.3 Code of Conduct	Conformance	<p>The Entity's parent company ALU-MET has issued and communicated documents (social standards document, anti-corruption guideline) including principles relevant to environmental, social and governance performance. These rules apply also for the Entity. The above mentioned documents can be accessed via the link: https://www.alu-met.com/werte-handeln/</p> <p>The documents are subject to annual review.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has issued and communicated internally and publicly a company policy statement addressing environmental, social and governance facets. The document can be accessed via the following link:</p>

CRITERION	RATING	COMMENT
		https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as their environmental and health and safety management system, the auditee has senior management endorsement and support through provision of resources and regular review of the policies. The Entity obtained ISO 14001 and ISO 50001 certification, which is consistent with their ASI Performance Standard Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the ALU-MET group's company policy internally (intranet) and externally as appropriate, available on the company website:</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf</p> <p>Note: All purchase and sales is done via the parent company ALU-MET.</p>
2.2 Leadership	Conformance	The Entity's Managing Director has the ultimate responsibility and authority for ensuring conformance with this Standard and to ensure sufficient resources to support the implementation of the Standard. He is supported by the Head of Quality as ASI representative for the ALU-MET group.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an integrated management system, with certified facets according to ISO 14001:2015 and ISO 50001:2018. The certificates are available on ALU-MET's website, please see:</p> <p>https://www.alu-met.com/verkauf/zertifikate/</p> <p>There are no overdue open actions from the latest audit report of the certification body.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>Although not yet developed to the same extent as the system for environment and energy (for these facets the Entity holds certificates according to ISO 14001 and ISO 50001), the facet "human and labour rights" is actively managed.</p> <p>Some documented processes and procedures are in place, which are adequate (considering the size and circumstances of the company) at this stage of implementation of the entity's social management system.</p>

CRITERION	RATING	COMMENT
		Relevant elements of a management system have been defined (goals, action plan, internal audit, review).
2.4 Responsible Sourcing	Conformance	<p>The ALU-MET group has issued its sourcing policy in a document named "Verantwortungsvolle Beschaffung" (Responsible Sourcing) in German language. It is available on their website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Beschaffungspolitik_.pdf</p> <p>A supplier due diligence process has been implemented and is applied.</p> <p>The audited Entity is not directly active on the market but all purchasing and sales of metals is done by parent company ALU-MET.</p>
2.5 Impact Assessments	Conformance	<p>A procedure specifying how to manage bigger projects is in place. Since the Entity's parent company joined ASI, there were no project ongoing, which required the Entity to assess cultural and human rights impacts.</p> <p>The projects undertaken needed an assessment of environmental and health & safety aspects, which was demonstrated and was also part of the ongoing permitting process.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has site specific emergency response plans developed, in collaboration with relevant stakeholders such as the local fire brigade. The auditee also holds an ISO 14001 certification which is current and in line with the Entity's certification scope under the ASI Performance Standard.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity did not undergo or plan a merger or acquisition (M&A) since the Entity's parent company ALU-MET joined ASI.</p> <p>However, a process has been defined to manage M&As, should it become relevant.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity is not the owner of the production facility but does rent the site from another company of the owner. Therefore the closure terms are defined in the rental agreement.</p> <p>The site is a well-established site; there no known plans for closing/decommissioning.</p> <p>The site is located in a highly regulated country (Germany), where relevant projects and changes (including closure and decommissioning) must undergo a thorough analysis and authorization</p>

CRITERION	RATING	COMMENT
		process and the Entity has systems in place to manage this effectively.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The ALU-MET group has prepared its Sustainability Report 2019 to report about its governance approach and its material environmental, social and economic impacts for the audited Entity and its "Speedline Aluminium" (Schlins) plant. The report is based on GRI (Global Reporting Initiative) G4 Criteria.</p> <p>The report is published on the ALU-MET website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity's parent company has publicly disclosed information on fines and alike of the ALU-MET group in its Sustainability Report (section 3.8 page 26):</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf</p> <p>As testified by management, there were no fines or similar paid in the reporting period or the current year of this audit.</p>
3.3a Payments to governments (legal and contractual)	Conformance	According to the Entity's tax auditor's report 2019 as well as testified by management, all payments to Governments were made on a legal and/or contractual basis.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established accessible complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established, accessible for all stakeholders: help@alu-met.com</p> <p>A physical complaint mailbox has opened the possibility for anonymous worker complaints. Due to the size and nature of the business, stakeholders can also easily reach top management directly.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated its life cycle impacts of its products and published the data in an

CRITERION	RATING	COMMENT
		<p>environmental product declaration, accessible from the following websites:</p> <p>www.ibu-epd.com</p> <p>and</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-Strangpressbolzen.pdf</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has evaluated its life cycle impacts of its products and published the data in an Environmental Product Declaration (EPD), accessible from the following websites:</p> <p>www.ibu-epd.com</p> <p>and</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-Strangpressbolzen.pdf</p> <p>The EPD is based on a cradle-to-gate approach and underlying norms are ISO 14025, EN 15804+A1 and ISO 14044.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The environmental product declaration (EPD-ALU-20200021-IBB1-DE) which has been published by the ALU-MET group, contains details of the boundaries, underlying assumptions and data sources, available from the website:</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-Strangpressbolzen.pdf</p>
4.2 Product design	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>As confirmed by interviews, document review and the site tour, the Entity has systems and a robust program in place to recycle about 100% of its aluminium process scrap, either within its own site, within the ALU-MET group or at external partners.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has developed and implemented processes that allow for the separation of different grades of aluminium. The effectiveness of these processes have been demonstrated through document review and a site tour.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>As a remelter of aluminium, the Entity has the clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a daily basis by updating and discussing related performance indicators.</p>

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products. As a recycling/remelting operation, the Entity has close contacts with recycling systems, as confirmed by their supplier list.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity does account for and publicly discloses its material GHG emissions and energy use by source on an annual basis, see the Entity's Sustainability Report (pages 20-23): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf</p> <p>The Entity has implemented and maintains an energy management system according to ISO 50001:2018, see the certificate at the link: https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/AGN/01112_020/960402_Aluminium_GmbH_Nachrodt_50001_2UEA_20_fp_DE.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>In line with its certified energy management system according to ISO 50001, the Entity has published GHG emissions reduction targets and established a plan to achieve these targets, see ALU-MET's Sustainability Report 2019 (page 23): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf</p>
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	In the ALU-MET Sustainability Reports, the Entity periodically reports on its emissions to air that have adverse effects on humans or the environment. As requested by the relevant authority, measurements are carried by an accredited independent laboratory every three years.

CRITERION	RATING	COMMENT
6.2 Discharges to Water	Conformance	The Entity discharges only cooling water directly into waters (creeks or rivers). The other effluents (storm water and sanitary water) are treated in the publicly owned waste water treatment plant. The directly discharged water does not have adverse effects on humans or the environment (the discharged quantity of the cooling water is less than 0,001% of the river's flow rate). The Entity regularly analyses the characteristics of the water.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	As part of its certified Environmental Management System according to ISO 14001, the Entity has a systematic approach to risk assessment which includes prevention and detection of spills and leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As part of its certified Environmental Management System according to ISO 14001, the Entity has established management and external communication plans, compliance controls and has a monitoring programme in place to prevent and detect spills and leakage (daily inspection, systematic maintenance).
6.4a Reporting of Spills (immediate disclosure)	Conformance	As part of the certified Environmental Management System, the Entity has procedures in place to ensure disclosure to affected parties the volume, type and potential impact of significant spills immediately after an incident. As reported in the Sustainability Report 2019 there was no significant release of substances in the 2019 reporting year (page 26): https://www.alu-met.com .
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is currently not applicable, as there were no relevant spills or uncontrolled release of hazardous material at the site since the parent company ALU-MET bought the Entity in 1999.
6.5a Waste management and reporting (strategy)	Conformance	In line with its Environmental Management System according to ISO 14001, the Entity has implemented a waste management strategy which is based on the waste mitigation hierarchy (avoid, re-use, reduce, recycle).
6.5b Waste management and reporting (disclosure)	Conformance	In line with its environmental management system according ISO 14001, the Entity has collected data on waste generation and disposal. The quantity of hazardous and non-hazardous waste generated by the Entity, and associated waste disposal methods, are reported in the

CRITERION	RATING	COMMENT
		publicly available Sustainability Report 2019 (pages 24): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.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)	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 works continually to maximise the recovery of aluminium by treatment of dross and dross residues. Key factors are trained workers, technical parameters of the furnace and the remelting process. All dross is being sent to recycling.
6.8b Dross (recycling)	Conformance	The Entity ships all recovered dross to a recycling facility.
6.8c Dross (review of alternatives)	Conformance	As the Entity does send all recovered dross to specialised recycling companies, there are no dross residues on site and therefore no landfill.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a system in place to identify and map its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Not Applicable	This Criterion is not applicable, as the Entity does not extract water from watersheds but only small amount of municipal water.
7.2a Water management (management plans)	Not Applicable	The evaluation did not identify a significant risk, as the annual usage of spring water is ca. 30.000 cubic meters per annum and the production site is not located in a water scarce area (annual precipitation ca. 800-1100 mm). Therefore, this Criterion is not applicable to the Entity.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the water risk assessment (see Criterion 7.1b) did not identify a material risk that would need to be managed.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water consumption in the Sustainability Report 2019 (pages 18-20): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Nachhaltigkeitsbericht.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A biodiversity impact assessment for the Entity's activities was conducted by a specialized external consultancy firm. The thorough assessment report was delivered in May 2021. It contains detailed proposals to the Entity's management.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	A Biodiversity Action Plan with time-bound targets is not yet available. The Entity has commissioned a biodiversity assessment and received the report immediately prior to the audit. The report contains proposals to the management, but these had not yet been agreed and translated into an action plan.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Minor Non-Conformance	A Biodiversity Action Plan is not yet in place as the underlying assessment has only been conducted very recently and the accompanying report was issued immediately prior to this surveillance audit.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Minor Non-Conformance	The Entity has not yet shared their achieved biodiversity outcomes with stakeholders nor made them publicly available.
8.3 Alien Species	Conformance	During the Entity's thermal processing of the aluminium scrap, all species are destroyed. Relevant remaining relevant risk are the supplied wooden pallets, which are externally incinerated (with heat recovery). The factory area is regularly cleaned of neophytes (during summer time).
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's parent company ALU-MET has issued its company policy and a "social standards" document, expressing a commitment to respect human rights. Both documents apply to the Entity in full, please see: https://www.alu-met.com/de/werte-handeln/
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a documented human rights due diligence assessment based on the "CSR Risk Check" of MVO Nederland, please see: https://www.mvorisicochecker.nl/en
9.1c Human Rights Due Diligence (remediation)	Conformance	As witnessed by management and according to the Human Rights due diligence study, the human rights assessments has confirmed that there are no salient adverse Human Rights impacts present at the audited Entity. This was confirmed during interviews during the audit. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, no remediation is needed.
9.2 Women's Rights	Minor Non-Conformance	As confirmed by site tour, document review and interviews, the Entity has developed and implemented policies, systems, procedures and

CRITERION	RATING	COMMENT
		<p>processes that conform to the women's rights requirements.</p> <p>However, the Entity has not yet designed all workplaces in the male-dominated environment in such a way that women would feel comfortable there.</p>
9.3 Indigenous Peoples	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in central Europe), 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 (which is located in central Europe), 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 (which is located in central Europe), as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity's Area of Influence are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements 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.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements 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	<p>The Entity respects the legal and customary rights and interests of Local Communities.</p> <p>All relevant activities are subject to a permitting process and the Entity maintains adequate contact to community officials.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity prevents any adverse impacts on Local Community livelihoods.</p> <p>Noise caused by unloading operations and production processes is the most relevant adverse</p>

CRITERION	RATING	COMMENT
		impact. The Entity works continually to reduce these emissions and demonstrated compliance with related legal requirements.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human Rights due diligence conducted has confirmed that there are no salient issues with local communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Minor Non-Conformance	<p>During the assessment, there were no indications observed that the entity would contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p> <p>The Entity does not purchase metals, but gets all raw materials from their parent company ALU-MET. However, it was not demonstrated that the Entity or ALU-MET have defined their understanding of "Conflict Affected and High Risk Area" and acted accordingly to ensure that they don't contribute directly or indirectly to armed conflict or human rights abuses.</p>
9.9 Security practice	Conformance	The Entity does only employ unarmed guards. Document review and worker interviews confirmed that the private security provider respects 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)	Conformance	<p>The Entity respects the rights of Workers to unite freely in the unions and seek representation without interference. A freely elected worker representation is in place. As confirmed by interviews with workers and management, the Entity takes an open attitude towards the election of a works council.</p> <p>However, the Entity is not bound by Collective Bargaining Agreements (CBA) negotiated between the employer association and the relevant union. Instead, a CBA is agreed between the worker representation and the employer.</p>
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	<p>All interviewed Workers confirmed that the employer respects their right to collective bargaining.</p> <p>Several collective agreements have been negotiated between the freely elected works council and the Entity's management.</p> <p>However, the Entity is not participating in or bound by Collective Bargaining Agreements negotiated</p>

CRITERION	RATING	COMMENT
		between the employer association and the relevant union.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Germany, the country, in which the Entity operates, applicable law does neither restrict the right to Freedom of Association nor collective bargaining. The Company has an open position on employee representation.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected. The youngest worker was 20 years old at the time of the audit, as confirmed by interviews and the employee roster.
10.2b Child Labour (hazardous)	Conformance	As confirmed by interviews with Workers and Management, the Entity does not employ minors under the age of 15 years. The youngest Worker employed was 20 years old at the time of the audit. Hence, the Entity is not engaging in hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	As confirmed by interviews with Workers and Management, the Entity does not employ minors under the age of 15 years. The youngest Worker employed was 20 years old at the time of the Audit. Hence, the Entity is not engaging in any Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and Management as well as a document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require 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 support the use of Forced Labour. The Entity does not hold

CRITERION	RATING	COMMENT
		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 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 site does not employ any armed security staff.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The evidence gathered during the audit (site tour, interviews with workers and management as well as document review) confirmed that the Entity does neither engage in nor support the use of Forced Labour. The Entity also does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's human rights due diligence assessment.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in nor 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	The Entity is committed to non-discrimination and communicates this commitment in its Company Policy. As confirmed by interviews and document review, the Entity does not actively engage in discrimination for the grounds mentioned in this Criterion. However, there is some area of improvement in the daily operation.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers. Nominated workers act as Safety Representatives (Sicherheitsbeauftragte), a joint Health & Safety committee is established, an anonymous letter box for raising suggestions or concerns is available. Workers meet daily with their superiors to discuss work related issues. Due to the small number of Workers, the Entity practices an "Open Door" policy rather than institutionalized systems for employee engagement.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers as mentioned in the requirements of this Criterion.
10.7a Remuneration (living wage)	Minor Non-Conformance	<p>As verified by document review (pay slips, time records) and interviews, the Entity does respect the right of workers to a living wage.</p> <p>Wages are oriented on the pay that has been set by the Collective Bargaining Agreement of the employer's association and the union (industry standard), although the Entity does not participate in these negotiations.</p> <p>Instead, a collective agreement has been negotiated directly between the Entity's works council and the management.</p> <p>However, a full match with the industry standard is not yet reached, as drivers of forklift trucks earn less than the minimum wage set forth in the industry standard (i.e. the CBA between the union and the employer association).</p>
10.7b Remuneration (method of payment)	Conformance	As has been verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employee's bank accounts and pay slips are provided to employees, which are detailed and understandable.
10.8 Working Time	Conformance	<p>Working time is part of each employment contract. Clocking-in system is in place. Records are on hand.</p> <p>Overtime is voluntary and due to the shift system is very limited.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	<p>The Entity's parent company has issued and made publicly available its Management Policy, which includes occupational health & safety, please see: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	As confirmed by interviews with Workers and Management, the Entity applies its occupational health & safety policy to all workers and visitors present at the site.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Management Policy does include the commitment to comply with all applicable legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has issued and communicated its Policy regarding Occupational Health and Safety. It states expressly, that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Major Non-Conformance	The Entity is committed to providing safe and healthy workplaces. However, 1) it was not demonstrated that a documented occupational health and safety management system that is conformant with applicable national and international standards is in place; 2) the Entity did not demonstrate that regular evacuation drills were conducted. Note: The Entity is currently preparing for ISO 45001 certification.
11.3 Employee engagement on health and safety	Conformance	The Entity has mechanisms in place to discuss Occupational Health & Safety issues with the Management and Workers (meetings between worker representatives, appointed safety representatives from the workforce. ("Sicherheitsbeauftragte" and a joint health & safety committee).
11.4 OH&S performance	Conformance	As confirmed by documented evidence, the Entity has developed and monitors various leading and lagging indicators on a monthly basis in accordance with the requirements of the ASI Performance Standard.

Document Control and Version History

Revision	Date	Notes
0	5 January 2021	Initial Certification Audit (Provisional Certification)
1	4 August 2021	Surveillance Audit