
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**HAMMERER
ALUMINIUM
INDUSTRIES
SANTANA SRL**

CERTIFICATE
NUMBER

101

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

11 NOVEMBER 2021

DATE OF EXPIRY

10 NOVEMBER 2024

CERTIFIED SINCE

11 NOVEMBER 2020

AUTHORISED BY

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

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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 extrusion billets and rolling ingots
from recycled aluminium scrap at the Santana SRL
facility, Romania.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Santana SRL
CERTIFICATION SCOPE	Production of extrusion billets and rolling ingots from recycled aluminium scrap at the Santana SRL facility, Romania.
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 (17 – 18 August 2020)Surveillance Audit (13 – 15 September 2021)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">17 – 18 August 2020 (Initial Certification Audit)13 – 15 September 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">15 October 2020 (Initial Certification Audit)6 November 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (17 – 18 August 2020)</u></p> <p>The audit scope includes the production of extrusion billets and rolling ingots from recycled aluminium scrap at the Santana SRL facility, Romania. Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the audit scope.</p> <p>At the time of the Audit (August 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>

Surveillance Audit (13 – 15 September 2021)

The audit scope includes the production of extrusion billets and rolling ingots from recycled aluminium scrap at the Santana SRL facility, Romania. Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

All relevant supply chain activities, and Criteria in the Performance Standard were included in the audit scope.

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.
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CERTIFICATION
PERIOD

11 November 2021 – 10 November 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

10 May 2023

CERTIFICATION
NUMBER

101

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. There are systems in place (e.g. legal databases) to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body. Copies of the certificates can be found at the Hammerer website: https://www.hai-aluminium.com/downloads HAI Group supports the site with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms. Amongst the instruments, there are an anti-corruption policy as well as a code of conduct (link: https://www.hai-aluminium.com/downloads/) issued and communicated internally and externally. Risks of corruption have been assessed. The Entity has provided training to employees with regards to business ethics. HAI Group operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor.
1.3 Code of Conduct	Conformance	The Entity has published and communicated a Code of Conduct for their employees both in English and the local language, please see: https://www.hai-aluminium.com/wp-content/uploads/2021/03/infotafel_coc_v3_a4_en_20210211.pdf There, it is clearly stated, that the Entity in no way tolerates corruption, antitrust violations, bribes, money laundering, unfair advantages, corruption or prohibited agreements.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The policies are subject of periodic employee training. The Entity holds certificates according to ISO 14001, ISO 45001 and ISO 50001 from an accredited certification body which is current for the Entity's certification scope.

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as the Entity's Environmental and Health and Safety Management System, the auditee has senior management endorsement and support through provision of resources and annual review of the policies. The Entity obtained ISO 14001, ISO 45001 and ISO 50001 certifications which are consistent with their ASI Performance Standard Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The HAI Group has communicated the policies internally and externally as appropriate (company website, intranet). Their supplier code of conduct is actively communicated to their relevant suppliers. Workers received training regarding environmental, social, and governance policies.
2.2 Leadership	Conformance	The Entity's Chief Operating Officer (Technical Managing Director) has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support implementation. The role is supported by the local team as well as by the staff from HAI Group. Responsibilities are reflected in the organization charts and job descriptions.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001 and an Energy Management System according to ISO 50001.</p> <p>These systems are certified by an accredited certification body, refer to the following link: https://www.hai-aluminium.com/downloads</p> <p>During the recent external audit of these management system, full compliance with said standards was confirmed and no non-conformity was raised.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an accredited OH&S Management System (ISO 45001). There are no non-conformities open from latest audit. The facets Human and Labour Rights are also managed, but no accredited certification available. Although the elements are present, the Social Management System is still not yet formalized.
2.4 Responsible Sourcing	Conformance	<p>The Entity has issued its sourcing policy called the 'Code of Conduct for Suppliers', see link below: https://www.hai-aluminium.com/wp-content/uploads/2021/03/infotafel_coc-suppliers_v3_a4_en_20210211-1.pdf</p> <p>The Entity's sourcing process is documented and it is in accordance with the requirements of the ASI</p>

CRITERION	RATING	COMMENT
		Performance Standard. Regular due diligence and supplier evaluation takes place, which is done by the Central Metal Management Department in Ranshofen, Austria, which conduct all metal purchases for the Entity.
2.5 Impact Assessments	Conformance	Larger projects or major changes to existing facilities did not take place since the Entity joined ASI. For the time being, no major changes/projects are foreseen. A procedure to ensure that social, cultural and Human Rights Impact Assessments, including a gender analysis, will be conducted for new projects or major changes to existing facilities (same as HAI Ranshofen) is present in Romanian language).
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed, in collaboration with relevant stakeholders such as the relevant authority an industrial neighbours. The Entity also holds ISO 14001 and ISO 45001 certifications which are current to the Entity's Certification Scope under the ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	The Entity did not undergo or plan a merger or acquisition (M&A) since becoming an ASI member. However, a process has been defined to manage M&As, should it become relevant.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity did not undergo or plan a closure, decommissioning or divestment since becoming an ASI member. However, a process has been defined to manage closure, decommissioning or divestment, should it become relevant. It is defined that environmental, social and governance issues shall be reviewed in such a case.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social and economic impacts by issuing its Sustainability Report 2020, based on GRI G4 Guidelines. This Report is issued for the HAI Group. It is available via the following link: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf

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3.2 Non-Compliance and liabilities	Conformance	<p>Information about significant fines, judgments, penalties and non-monetary sanctions is included in the Sustainability Report 2019 on page 34, see https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf</p> <p>As witnessed by the Entity's management, there were no significant fines, judgments, penalties and non-monetary sanctions enforced in 2018 and 2019 YTD. In the Sustainability Report 2020 on page 25, it is confirmed that "In the 2020 reporting year, neither fines nor non-monetary sanctions were imposed to due to non-compliance with environmental laws or regulations." Please refer: https://www.hai-aluminium.com/wp-content/uploads/2021/06/Sustainability-report-2020_Englisch.pdf</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to governments and facilitation of payments. The Codes of Conduct for employees and for suppliers can be accessed at: https://www.hai-aluminium.com/downloads</p> <p>As witnessed by the Entity's management and confirmed by the report of the financial audits 2019 and 2020, the Entity did not make government payments other than taxes, fees and social insurance. All payments are subject to annual external financial audit.</p>
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>In the code of conduct, stakeholders are made aware of the contact details of the legal counsel. Also, in the Sustainability Report 2019, stakeholders are encouraged to raise their concern and a dedicated email address has been set-up: sustainability@hai-aluminium.com</p> <p>A Complaints Resolution Mechanism has been established, as well as a register of complaints/grievances (Email and anonymous "Letter box"). No cases have been recorded so far.</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 with assistance from "Denkstatt", an

CRITERION	RATING	COMMENT
		organisation that specialises in these type of assessments.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has a Life Cycle Assessment in place (prepared by a specialised external service provider). Until the time of the audit, there were no customer requests yet for a cradle-to-gate life cycle assessment on its products.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity did not publicly communicate about Life Cycle Assessment (LCA), as this assessment was finalized after the issue of the latest sustainability report. It is planned to communicate about the LCA in the next version of the Sustainability Report.
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 systems and a robust program in place to recycle 100% of its aluminium process scrap onsite. The minimization of internally generated scrap is a management priority and it is monitored on monthly basis. The Entity's waste balance is reported in their Sustainability Report 2020 on page 23: https://www.hai-aluminium.com/wp-content/uploads/2021/06/Sustainability-report-2020_Englisch.pdf
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of aluminium. Due to quality reasons, it is in the best interest of the Entity, to separate the various alloys and grades.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	As a recycler of aluminium, the Entity has a clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a monthly basis. The HAI Group works with national and international scrap dealers.
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.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has disclosed its material greenhouse gas emissions and energy use by source in its

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		<p>Sustainability Report 2019 on page 32, which can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf</p> <p>The latest information is available in the Sustainability Report 2020 on page 25: https://www.hai-aluminium.com/wp-content/uploads/2021/06/Sustainability-report-2020_English.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 of the HAI Group and implemented a plan to achieve these targets in the Sustainability Report 2019 on page 21: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf.</p> <p>The targets address direct GHG emissions but not yet the indirect ones, due to the nature of the business.</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	<p>Emissions data is published in the Sustainability Report 2019, page 32: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf</p>
6.2 Discharges to Water	Conformance	<p>The Entity reports quantitative data on its discharges to water in its Sustainability Report 2019, page 26: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf</p> <p>Wastewater from production and sanitary is treated on site. Following treatment, the water is discharged to a local natural canal (as well is storm water, which is going through an oil separator first).</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>Within the scope of its certified Environmental Management System according to ISO 14001, the Entity periodically assesses the major risks areas</p>

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		related to Spills and Leakages. The ISO 14001 certificate can be accessed via the following link: https://www.hai-aluminium.com/wp-content/uploads/2017/09/ISO_14001_HAI_Santana_GmbH_EN.pdf
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented an Environmental Management System, including emergency, monitoring and communication procedures, to deal with the major risks of Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The requirement to disclose to affected parties the volume, type and (potential) impact of significant Spills is already covered by ISO 14001 certification. Information to the public is made via the annual Sustainability Report 2019, page 34: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf No major spills have been reported so far.
6.4b Reporting of Spills (regular reporting)	Conformance	As reported in the Sustainability Report 2019, page 36, there was no significant release of substances in the 2019 reporting year: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf
6.5a Waste management and reporting (strategy)	Conformance	In line with its certified Environmental Management System according to ISO 14001, the Entity implemented a waste management strategy according to the Waste Mitigation Hierarchy. This has been confirmed by interviews and review of the Entity's Annual Environmental Report 2019.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the quantity of their generated waste in the Sustainability Report 2019, page 33: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.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.

CRITERION	RATING	COMMENT
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	100% of the gathered Dross is recycled on-site. No Dross is landfilled. The Entity works continuously 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.
6.8b Dross (recycling)	Conformance	100% of the gathered Dross is recycled internally. No Dross is landfilled. All Dross residues (salt slag) is sent for recycling (to either domestic or international treatment plants).
6.8c Dross (review of alternatives)	Conformance	100% of the gathered Dross is recycled internally. The Entity does not dispose Dross residues in landfill. Dross residues are recycled by specialized recycling companies.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type. The documented water mapping identifies the source, use and destination of the water streams and quantifies them.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in watersheds in their Area of Influence. As confirmed by

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		the local authority, the Entity's activities do not create stress to the watershed.
7.2a Water management (management plans)	Not Applicable	This Criterion of the ASI Performance Standard is not applicable, as the water assessment did not identify material risks related to water withdrawal. A written statement from the local authority has confirmed the Entity's evaluation.
7.2b Water management (monitoring)	Not Applicable	This Criterion of the ASI Performance Standard is not applicable, as the water assessment did not identify material risks related to water withdrawal. A written statement from the local authority has confirmed the Entity's evaluation.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water withdrawal and use in the Sustainability Report 2019, page 28: https://www.hai-aluminium.com/wp-content/uploads/2021/03/FINAL-EN-Sustainability-report-2019-1.pdf The site did not identify water-related risks as material, therefore there is no according statement in the Sustainability Report.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Based on the biodiversity assessment (conducted by a specialized consultant), the Entity has implemented a biodiversity action plan. Its implementation is monitored periodically.
8.2a Biodiversity management (Biodiversity Action Plans)	Conformance	As confirmed by document review, the Entity has established and now implements a biodiversity action plan, which is endorsed by the site management team and contains time-bound goals.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Conformance	The Entity's biodiversity action plan reflects the biodiversity mitigation hierarchy. Consultation with relevant stakeholders has been started, but without much interest from the stakeholders to date.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	Since the Entity has established its biodiversity action plan only recently, a reporting mechanism is not yet in place.
8.3 Alien Species	Conformance	The Entity's assessment of the legal requirements regarding wooden packaging material as well as the biodiversity assessment, which included the aspect of Alien Species, did not identify any need for action. During the Entity's thermal processing of the aluminium scrap, all species, which might be brought to the site and are hiding in the scrap, are destroyed.

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8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (Policy)	Conformance	The Entity has issued its Codes of Conduct for employees and suppliers, expressing a commitment to respect Human Rights. These documents have been communicated to employees (notice boards, training, intranet etc.) and other stakeholders (letters, internet etc.). The codes can be accessed via the following link: https://www.hai-aluminium.com/en/downloads
9.1b Human Rights Due Diligence (Process)	Conformance	The Entity has conducted a documented Human Rights Due Diligence assessment but consultation of external stakeholders was not systematic. According to the assessment, there are no salient human rights issues identified, related to the Entity. Nevertheless, it is suggested that the situation of women and the situation of national minorities are considered more specifically in the next assessment, as these topics could be relevant for the Entity’s activities.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity’s Human Rights assessment has confirmed that there are no salient adverse human rights impacts present at the audited site. Indigenous Peoples are not present in the region or in the area of influence of the Entity.
9.2 Women’s Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the women’s rights requirements. During interviews and document review, no indication for deliberate discrimination of women was observed. However, only 12 out of 125 employees are female, with the physicality of many roles potentially being a barrier to greater female participation. In accordance with national law, the Entity grants up to two years paid maternity leave.

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9.3 Indigenous Peoples	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in eastern 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 eastern 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 eastern Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no Resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no Resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	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 issues with local Communities and therefore no need for action.
9.7b Local Communities (impacts)	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 issues with local Communities and therefore no need for action.
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 issues with local Communities and therefore no need for action.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity is not located in or near a Conflict-Affected or High-Risk Area (CAHRA). The Entity follows the definition of CAHRAs from the "Armed Conflict Location Event Data Project": www.acleddata.com and Peace Direct: www.peacedirect.org</p> <p>According to list of suppliers, there is no supply from a CAHRA. Metal supply is completely managed from Headquarters in Ranshofen (Austria).</p> <p>All new suppliers undergo a due diligence process. 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>
9.9 Security practice	Conformance	<p>The Entity does not employ armed security forces. The Entity's Human Rights risk assessment did not identify specific risks related to security practices. During the audit, no such risks were identified.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	<p>As confirmed by interviews with worker representatives, workers and management as well as via document review, the Entity respects the rights of Workers to unite freely in the unions, seek representation and join the Workers council without interference. A freely elected worker representation is in place.</p> <p>Note that a union is not represented at the Entity.</p>
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	<p>The Entity does respect the right of collective bargaining. Worker representatives and management negotiated a comprehensive collective bargaining agreement (CBA) site level.</p> <p>The HAI Group supports the labour rights as defined by the International Labor Organization (ILO), see: https://www.hai-aluminium.com/wp-content/uploads/2019/11/CoC_HAI_GmbH_2019.pdf</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	<p>This Criterion of the ASI Performance Standard is not applicable to the Entity, as the right to freedom of association and collective bargaining is not restricted in Romania, where the Entity operates.</p>
10.2a Child Labour (minimum age)	Conformance	<p>As per the Entity's Code of Conduct, Child Labour is prohibited, please refer: https://www.hai-aluminium.com/downloads/</p> <p>The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected.</p> <p>The youngest Worker on site is 21 years old. There</p>

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		are robust practices in place to ensure that children are not employed.
10.2b Child Labour (hazardous)	Conformance	As confirmed by observations during the site tour, interviews and document review, the Entity does neither use nor support the use of Child Labour. Persons below the age of 16 years are not employed. Young workers (16 - 18) do not work with hazardous substances.
10.2c Child Labour (worst forms)	Conformance	As confirmed by observations during the site tour as well as by interviews with workers, worker representative and management, the Entity does neither use nor support the use of Child Labour and does not engage in or supporting Worst Forms of Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	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.
10.3b Forced Labour (deposits, fees, advances)	Conformance	From interviews with workers, worker representatives and management it was derived that 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.
10.3c Forced Labour (Migrant Workers)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not require Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (Debt Bondage)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. The Entity does not offer on-site housing.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	Interviews with management and workers as well as document review confirmed that the Entity does not

CRITERION	RATING	COMMENT
		retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Interviews with management and workers confirmed that the Entity does not deny Workers the freedom to terminate their employment at any time without penalty and given notice of a reasonable length.
10.4 Non-Discrimination	Conformance	Interviews with workers, worker representative and management as well as document review confirmed that the Entity does not deliberately discriminate for reasons mentioned in the Criterion. However, due to the type and nature of the business (shift work), there are no females in production currently, as no women applied for relevant jobs.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers. A formal procedure to manage grievances is in place.
10.7a Remuneration (living wage)	Conformance	The Entity does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and worker interviews. The wages paid are substantially above the legal minimum. Working time, payment and leave are negotiated in a site specific collective bargaining agreement.
10.7b Remuneration (method of payment)	Conformance	Monthly payments to Workers are made in full by the Entity via bank transfer. Workers receive pay slips which list in detail all necessary information about hours worked, surcharges and deductions.
10.8 Working Time	Conformance	As confirmed by interviews with workers, worker representative and management, the Entity complies with Applicable Law and industry standards on working time, public holidays and paid annual leave. Working Time is part of the site-specific collective bargaining agreement. A 'clocking-in' system is in place.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated its OHS policy as required by the ASI Performance Standard. The certificate is posted on the Hammerer website, please check the following link: https://www.hai-aluminium.com/en/downloads
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated (postings, intranet) its OHS policy as required by the ASI Performance Standard. The OHS Policy is publicly available on the Hammerer website, please check the following link: https://www.hai-aluminium.com/en/downloads
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	The Entity has included in its Policy statement related to occupational health and safety and in their Codes of Conduct, a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has included in its Policy statement related to occupational health and safety and in their Codes of Conduct, a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety. The OHS Policy of the Entity is available on the Hammerer website: https://www.hai-aluminium.com/en/downloads
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body, therefore it is eligible for harmonization.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a joint health and safety committee, which meets periodically (four times per year). Additional mechanisms are in place, such as interdepartmental workshops, where Workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity holds a certification according ISO 45001.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety (OH&S) performance regularly and several key

CRITERION	RATING	COMMENT
		performance indicators (leading and lagging) are related to OH&S. The Entity has several tools for evaluating performance and continuously improves its OH&S Management System.

Document Control and Version History

Revision	Date	Notes
0	11 November 2020	Issued (Provisional Certification)
1	11 November 2021	Surveillance audit - Full Certification