
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

REMI CLAEYS ALUMINIUM N.V.

CERTIFICATE
NUMBER

170

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

26 APRIL 2019

DATE OF EXPIRY

25 APRIL 2022

CERTIFIED SINCE

26 APRIL 2019

AUTHORISED BY

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard and
can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

The process casting of ingots for hot rolling coils. The process of cold rolling and slitting of aluminium coils and strips, and the manufacturing of aluminium HF seam welded tubes at the Lichtervelde facility, Belgium.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Remi Claeys Aluminium N.V.
ENTITY NAME	Remi Claeys Aluminium N.V.
CERTIFICATION SCOPE	The process casting of ingots for hot rolling coils. The process of cold rolling and slitting of aluminium coils and strips, and the manufacturing of aluminium HF seam welded tubes, at the Lichtervelde facility, Belgium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Semi-Fabrication• Material Conversion (Production and Transformation)
ASI STANDARD	Performance Standard V2
ACQUISITION / DIVESTMENT	<p>The Hydro Aluminium Extruded Solutions owned - Lichtervelde Precision Tubing (Belgium) Entity was purchased by Remi Claeys on 2 July 2021. As Hydro Aluminium Extruded Solutions was the controlling Entity at the time the most recent scope change audit was undertaken (17-18 November 2020), 'Hydro' and 'Hydro Aluminium Extruded Solutions' are referenced throughout this Report. The most recent Audit Outcome (as Hydro Aluminium Extruded Solutions) is also provided. The Audit Details relate to the Scope Change Audit where the Lichtervelde facility was initially incorporated into the Certification Scope.</p> <p>For all certification transfers to different controlling Entities, ASI requires a Surveillance Audit of the new controlling Entity to be undertaken within 12 months from the transfer of Entity ownership, or a Re-Certification Audit if the current certification period expires within the 12 month provision.</p> <p>All transferred certifications are deemed 'Provisional' until the successful completion of the Surveillance Audit or Re-Certification Audit.</p>
AUDIT TYPE	<ul style="list-style-type: none">• Scope Change Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 18 March 2019 – 24 June 2019

AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> • 3 September 2019
AUDIT SCOPE	<p>The audit scope covers the Hydro Aluminium Extruded Solutions Lichtervelde Precision Tubing (Belgium) Entity. Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> • Aluminium Re-melting/Refining • Semi-Fabrication • Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	26 April 2019 – 25 April 2022
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	25 April 2022
CERTIFICATE NUMBER	170

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Anti-Corruption policy and Integrity program in place and implemented in the organisation by training and compliance activities. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct procedure including principles relevant to environmental, social and governance performance. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance policies. Link: www.hydro.com/principles
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedures have senior management approval.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity is communicating the Policies internally, and externally as appropriate. For instance, in the annual report on the web and in the Management System. Link: www.hydro.com/principles

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems. Link: www.hydro.com/principles
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented integrated Social Management Systems. These systems are integrated into the relevant social aspects of OHSAS 18001 and/or ISO 45001 certifications, where sites are certified to these standards, as well as processes related corporate social policies including the Hydro Human Rights Policy, the Code of Conduct, management of labour rights, and occupational health and safety.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues. Link: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/responsible-supply-chain/
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. Link: https://www.hydro.com/en/investors/reports-and-presentations/
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and relevant agencies.
2.7 Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed by the Entity's CVP (Capital Value Process).
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance

CRITERION	RATING	COMMENT
		issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The reporting is accessible for instance through the GRI Index reporting on the web: https://www.hydro.com/en/download-center/
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting. Hydro GRI Index: https://www.hydro.com/en/download-center/ https://www.hydro.com/en/investors/reports-and-presentations/
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the annual report accessible on the web: https://www.hydro.com/Document/Index?name=Hydro%20Annual%20Report%202017&id=3097 https://www.hydro.com/en/investors/reports-and-presentations/
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 accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the web: https://www.hydro.com/en/contact-us/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used, e.g., through Life Cycle Assessment (LCA) studies performed by independent institutions or case by case with customer interactions and needs.

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly communicates Life Cycle Assessment (cradle to gate) information through international studies and is a key contributor with analysis and data in this respect.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly communicates LCA information through international studies available on the web. The public communications include the underlying assumptions, including the system boundaries.
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. Hydro has a climate strategy to ensure it produces aluminium with a low energy consumption and greenhouse gas emissions. Where product design occurs at Hydro Extruded sites, an optimization program is used for the design, to maximize outcomes including sustainability, such as through reduction of scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies targeting 100% scrap for collection, recycling and/or reuse, supporting a circular economy thinking.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established good systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate aluminium as a building block for the low-carbon circular economy, continue to reduce its environmental footprint, increase recycling of post-consumer scrap. Targets, activities and timelines have been established, including collection and recycling of products at end-of-life: https://www.hydro.com/en/about-aluminium/aluminium-life-cycle/
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaging in different recycling initiatives and increasing capacity to process post-consumer scrap. For instance, the 75R (75% post-consumer recycling content) claim is a good example of this. https://www.hydro.com/en/products-and-services/low-carbon-aluminium/hydro-circal-75r/

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions and energy use in its environmental reporting as part of the annual report: https://www.hydro.com/en/investors/reports-and-presentations/
5.2 GHG emissions reductions	Conformance	The Entity has an ambitious target and strategy to be carbon neutral by 2020. Different roadmaps, projects and initiatives support this strategy. Hydro's annual report 2017: https://www.hydro.com/en/investors/reports-and-presentations/
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has good systems and procedures to minimize impacts and reports on emissions to air to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web.
6.2 Discharges to Water	Conformance	The Entity has good systems and procedures to minimize impacts and report on discharges to water to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity 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 has extensive plans, compliance controls and a monitoring programme in place to prevent and detect spills and leakages. An external communication plan/procedure for spills and leakages is in place.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills.

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6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. https://www.hydro.com/en/investors/reports-and-presentations/
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a strong strategy on recycling and waste mitigation, developed in accordance with the Waste Mitigation Hierarchy. Several projects and investment on improving recycling are implemented, as well as reducing waste.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposals in the annual report. https://www.hydro.com/en/investors/reports-and-presentations/
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	Dross generated from the Entity's sites with casting operations is treated with a corporate

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		partner to maximise the recovery of Aluminium. Also, the Entity implements processes to reduce generation of dross.
6.8b Dross (recycling)	Conformance	Dross generated from the Entity's sites with casting operations is treated with a corporate partner. Dross fines are recycled. Also, the Entity implements processes to reduce generation of dross.
6.8c Dross (review of alternatives)	Not Applicable	All of the Dross is treated and there is no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use locally and reports through internal environmental reporting.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed risks related to operational, internal and external risk in its area of influence. The area of influence included in the assessments varies with each facility but takes into account dependent on relevant factors such as nearby water bodies, aquifers, sensitive environments, competing users for the water resource and impacts from associated facilities, as appropriate. Notably, the Entity's water withdrawal, use and water related risks are low because most of the Entity's sites have closed loop water management systems.
7.2a Water management (management plans)	Conformance	The Entity maps risks and implement a management plan. From this, targets and actions are established (time bound).
7.2b Water management (monitoring)	Conformance	The Entity supports the SDG's (Sustainable Development Goals) and has identified water stewardship as a prioritized topic of its operation. The Entity monitors the effectiveness of its water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has mapped its water withdrawal and use and reports through Hydro Environmental Reporting platform, as well as to local authorities. Water withdrawals and use is also included in Environmental Profile Report 2018: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018 Material water related risks, when relevant, are also publicly disclosed.

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PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>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 area of influence included in the assessments varies with each facility but takes into account, dependent on relevance, factors such as proximity to sensitive environments, and impacts from associated facilities, as appropriate. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity is addressing in the annual report support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>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 sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The assessment has time-bound targets and the plan is monitored for effectiveness. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>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. Affected personnel and external stakeholders have been consulted, informed and trained about the management plans and Controls. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity</p>

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		issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/
8.2c Biodiversity management (reporting)	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 sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics as biodiversity and alien species, and is proactive in preventing the deliberate or accidental introduction of alien species.
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 established a Human Rights Policy: https://www.hydro.com/Document/Index?name=Human%20Rights%20Policy.pdf&id=3007
9.1b Human Rights Due Diligence (process)	Conformance	The Entity shows very good practice in this area, with an extensive human risk mapping carried out with the Danish Institute for Human Rights, on the entirety of its supply chain including

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		business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas. A Human Rights Due Diligence process is in place that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity shows good practice in this area, with an extensive human risk mapping on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Business Areas. A human rights risk mapping for the Entity has recently been done as part of the Enterprise Risk Management process. Mitigating actions are undertaken based on findings and recommendations. The Danish Institute for Human Resources states that Hydro is acting on the issues identified during Human Rights Risk Mapping.
9.2 Women's Rights	Conformance	The Entity's Code of Conduct clearly states the equality between genders and is working to raise the share of women in the workforce. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
9.3 Indigenous Peoples	Not Applicable	Corporate level: Hydro Human Rights Policy Local level: No presence of Indigenous People. This requirement is not applicable for the Certification Scope where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Corporate level: Hydro Human Rights Policy Local level: No presence of Indigenous People. This requirement is not applicable for the Certification Scope where the Entity operates
9.5 Cultural and sacred heritage	Not Applicable	Corporate level: Hydro Human Rights Policy Local level: No presence of Indigenous People, or cultural or sacred sites. This requirement is not applicable for the Certification Scope where the Entity operates
9.6a Resettlements (avoid or minimise)	Not Applicable	Principles, Hydro Human Rights Policy

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		<p>The Entity has implemented a procedure at a group level that covers impacts of any resettlements.</p> <p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>Principles, Hydro Human Rights Policy</p> <p>The Entity has implemented a procedure at a group level that covers impacts of any resettlements.</p> <p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity's community engagement and corporate sustainability reporting guidelines demonstrate respect to legal and customary rights and interests of local Communities. There are documented policies and procedures for identifying and assessing the legal and customary rights of local Communities. The Entity has recently done a human rights risk mapping in the Enterprise Risk Management process.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity takes appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. The Entity has done a follow-up on relevant findings from human rights report, and has recently conducted a human rights risk mapping in the Enterprise Risk Management process. Complaints resolution mechanisms are in place.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has a proactive approach to working with local Communities and neighbourhood organizations to improve and support mutual interests.</p>
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	<p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.9 Security practice	Conformance	<p>The Entity adheres to the Voluntary Principles on Security and Human Rights regardless of their geographic location. This is addressed in the Annual Report 2017 available on the web: https://www.hydro.com/en/investors/reports-and-presentations/</p>

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states the recognition of the principle of freedom of association and the right to join employee organizations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states the recognition of the principle of freedom of association and the right to join employee organizations. For the sites in the Entity's Certification Scope, there is a freely elected workers council in place and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	There is no employment of workers under age of 16 years. The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 16.
10.2b Child Labour (hazardous)	Conformance	There is no employment of workers under age of 16 years. The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 16.
10.2c Child Labour (worst forms)	Conformance	There is no employment of workers under age of 16 years. Child labour is no issue in Belgium. Interviews with members of HR teams. Extract from Hydro's People Directive section 4.14: Hydro does not accept child labour and will not employ children below the age of 16. If the child is secured the right for education, play, rest and family life, limited exceptions may be made if this is clearly in the best interests of the child. Hydro shall not employ forced labour. Corporate: People Directive, Supplier Code of Conduct, Hydro's Human Rights Policy and Legislation.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts forced labour. In 2019 Social accountability supplier audits will be performed to ensure compliance. Link to Hydro Code of Conduct:

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		https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity. No deposits are held, no recruitment fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity. 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. Only copies are stored.
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.
10.5 Communication and engagement	Conformance	Workers' council have regular meetings with Management Representatives and is part of H&S Committees.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity.
10.7a Remuneration (living wage)	Conformance	Living Wages are paid at the Entity. Wages are defined due to Collective Bargaining Agreements and Trade Union Wage tables.
10.7b Remuneration (method of payment)	Conformance	Payment of wages is conducted monthly in a punctual manner. All workers receive pay checks with payment details.
10.8 Working Time	Conformance	Different shift models are in place. These are approved by Workers council and local authorities. Public holidays and annual leave are paid according to local law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a global Health and Safety Policy owned by the President and CEO.

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11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Policy on HSE (health, safety and environment) is communicated in several ways. For instance, publicly on web or visually on boards and through training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Policy includes a commitment to comply with Applicable Law on Workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Policy on HSE addresses the importance of safe work always being the most important, and a commitment to comply with all Applicable Laws.
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.
11.3 Employee engagement on health and safety	Conformance	The Entity is following best industry practice on Occupational Health and Safety with close cooperation between management and the employees.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and several key performance indicators are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve.

Document Control and Version History

Revision	Date	Notes
0	1 December 2021	Issued following Remi Claeys ASI membership. The site was initially certified as part of Certification 23 for Hydro Aluminium Extruded Solutions.