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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# OETINGER ALUMINIUM

CERTIFICATE  
NUMBER

164

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

PROVISIONAL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

GUTCERT  
(AFNOR  
GROUP)

DATE OF ISSUE

13 DECEMBER 2021

DATE OF EXPIRY

12 DECEMBER 2022

CERTIFIED SINCE

13 DECEMBER 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](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Production of recycled aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.

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# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

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### OVERVIEW

MEMBER NAME	Oetinger Aluminium
ENTITY NAME	Oetinger Aluminium
CERTIFICATION SCOPE	Production of recycled aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (30 September – 1 October 2021)</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>30 September – 1 October 2021 (Initial Certification Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 November 2021</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (30 September – 1 October 2021)</u></p> <p>The audit scope covers the production of recycled aluminium alloys in form of liquid metal and ingots, including refining process, at the Weißenhorn and Neu-Ulm Plant, Germany.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Re-melting/ Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Provisional Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ 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	13 December 2021 – 12 December 2022
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	12 June 2022
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CERTIFICATE NUMBER	164
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## 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 the ASI Performance Standard legal compliance requirements. The Managing Director 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, ISO 50001 and IATF 16949 certificates from accredited certification bodies to ensure compliance with Applicable Law, see: <a href="https://www.oetinger.net/de/Zertifikate.php">https://www.oetinger.net/de/Zertifikate.php</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has issued an Anti-Corruption guideline and communicates it internally. Employees have received training accordingly.</p> <p>Note: the Entity operates in a country with comparably less risk of corruption (Transparency International Corruption Perceptions Index 2020: Rank 9 of 180).</p>
1.3 Code of Conduct	Conformance	<p>The Entity has issued and communicated its Company Guideline in German, see: <a href="https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;">https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;</a></p> <p>This document covers principles relevant to environmental, social and governance performance.</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 and Guideline addressing environmental, health and safety, social and governance facets. The documents can be accessed from the Entity's website: <a href="https://www.oetinger.net/de/Zertifikate.php">https://www.oetinger.net/de/Zertifikate.php</a></p> <p>Resources for implementation of the Policy are provided.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's top management has endorsed the Company Policy. Interviews and document review confirmed that the management provides adequate resources to implement this Policy.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's Company Policy has been communicated internally and externally. Employees have been trained on the Policy. The Policy is available on the Entity's website: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Unterne_hmenspolitik_2021_signed.pdf?m=1631869604&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Unterne_hmenspolitik_2021_signed.pdf?m=1631869604&amp;</a>
2.2 Leadership	Conformance	The Entity's Managing Director has the ultimate responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support its implementation . The role is supported by the Quality Manager as the ASI Representative for OETINGER Aluminium GmbH.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Integrated Management System, with a certified environmental facet according ISO 14001:2015 and ISO 50001:2018. There are no overdue open actions from the latest audit report of the certification body
2.3b Environmental and Social Management Systems (social)	Major Non-Conformance	The Entity holds certificates according ISO 14001 and ISO 50001 to systematically manage their environmental aspects. The system to manage the Entity's governance aspects are adequate (organized accounting, annual tax audit, regular checks by the authority, external data protection officer, external legal advisers). However, although many aspects of human and labour rights are managed, a formal system is not yet in place for this facet.
2.4 Responsible Sourcing	Conformance	The Entity has issued and made publicly available their sourcing policy, see: <a href="https://www.oetinger.net/de/PDF/Zertifikate/CSR-Nachhaltigkeitsanforderungen_an_Lieferanten.pdf?m=1631869500&amp;">https://www.oetinger.net/de/PDF/Zertifikate/CSR-Nachhaltigkeitsanforderungen_an_Lieferanten.pdf?m=1631869500&amp;</a> Suppliers are requested to respond to the Entity's supplier questionnaire. Supply chain risks have been evaluated.
2.5 Impact Assessments	Conformance	A procedure specifying how to manage bigger projects is in place. Since the Entity joined ASI, there has been no project ongoing, which required the Entity to assess cultural and Human Rights impacts.
2.6 Emergency Response Plan	Conformance	The Entity has established a specific Emergency Response Plan. The Plan includes a message chain to the authorities.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	<p>Recently, the Entity did conduct a merger (OETINGER Aluminium WH GmbH and OETINGER Aluminium NU GmbH).</p> <p>However, this was a formal legal act, without any further impacts related to Governance, Environment and Social facets, as both entities belonged to the same owner and were operating according the same management principles and rules. Nevertheless, a process has been defined to manage future mergers and acquisitions, should it become relevant.</p> <p>The site is located in a highly regulated country (Germany), where relevant projects and changes must undergo a thorough analysis and authorization process and the Entity has systems in place to manage this effectively.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>As confirmed by management interviews, there are no plans for any closure and decommissioning. However, the Entity has a procedure in place to manage closure and decommissioning, should it become relevant.</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 process and the Entity has systems in place to manage this effectively.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has issued its Sustainability Report 2020 to report its governance approach and its material environmental, social and economic impacts, see: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Nachhaltigkeitsbericht_2020_V1.pdf?m=1632995968&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Nachhaltigkeitsbericht_2020_V1.pdf?m=1632995968&amp;</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has publicly disclosed information about fines in its Sustainability Report: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Nachhaltigkeitsbericht_2020_V1.pdf?m=1632995968&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Nachhaltigkeitsbericht_2020_V1.pdf?m=1632995968&amp;</a></p> <p>As confirmed 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	<p>According to the Entity's tax auditor's report 2019 as well as confirmed by management, all payments to governments were made on a legal and/or contractual basis.</p>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity can be contacted through their website. There is a dedicated email address in place where stakeholders can contact the Entity to raise concerns or complaints.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has provided evidence of Life Cycle Assessment of its major products. The analysis comprises CO <sub>2</sub> Scopes 1 and 2. For specific products, also Scope 3 has been considered.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has provided Life Cycle Assessment (LCA) information on its products (CO <sub>2</sub> Scope 1-3) upon customer request.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	As confirmed by interviews and document review, the Entity did not make their environmental Life Cycle Assessment publicly available.
4.2 Product design	Not Applicable	This Criterion is not applicable, because as a re-smelter, the Entity does not take any design responsibility. Only liquid aluminium and semi-finished products (ingots) are produced.
4.3a Aluminium Process Scrap (targets)	Conformance	As a re-smelter, the Entity recycles 100% of its own Process Scrap.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity thoroughly separates alloys for recycling as confirmed by a site tour, interviews and documents. As a re-smelter, it is in the Entity's own commercial interest to optimize its alloy separation.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a re-smelter, it is the Entity's strategy to recycle as much scrap as possible with the highest yield possible. The strategy is documented. The Entity co-operates with their partners to realize this strategy. For 75 years Oetinger has been producing aluminium alloys in the form of liquid and block metal on a recycling basis.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	As a recycler and re-smelter, the Entity co-operates with scrap metal collectors and traders. The Entity is member of the German Aluminium Association (Gesamtverband der Aluminiumindustrie e.V. - GDA), which seeks to foster the recycling of aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity does account for and publicly discloses material GHG emissions and energy use by source

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		on an annual basis in the Environmental Declaration 2021, pages 12 and 16, please see: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Umweltterklaerung_OE_2020_final.pdf?m=1633415631&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Umweltterklaerung_OE_2020_final.pdf?m=1633415631&amp;</a> The Entity has implemented and maintains an Energy Management System according ISO 50001:2018 (certificate valid until 05 Aug 2024).
5.2 GHG emissions reductions	Conformance	The Entity has published its GHG reduction targets in its "CO <sub>2</sub> Roadmap (60% reduction in 2020 - 2035). This roadmap is publicly available: <a href="https://www.oetinger.net/de/Mission.php">https://www.oetinger.net/de/Mission.php</a> The Entity holds an ISO 50001 certification, therefore objectives and targets as well as action plans are in place.
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 reported their emissions to air and plans to minimize pollutants, which are publicly available in the organisation's Environmental Declaration 2021.
6.2 Discharges to Water	Conformance	The Entity does not directly discharge effluents into waters (such as creeks or rivers). Instead, effluents are discharged to and treated in a publicly owned waste water treatment plant. Storm water is led through an oil separator and then discharged to the adjacent creek Leibi. Quantitative data is provided in the Environmental Declaration (issued 2021).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	As confirmed by document review, interviews and a site tour, the Entity has performed periodic risk assessments and implemented prevention measures on material Spills and Leakages (to air, water and soils). The risk assessments are part of the Entity's ISO 14001 certification.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As part of the Entity's Environmental Management System, communication plans, compliance controls and a monitoring programme are in place to prevent and detect Spills and Leakages. As

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		witnessed by the management, there haven't been any relevant Spills since 2019. Information about actual incidents would be publicly available in the Entity's Environmental Declaration, see link: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Umwert/terklaerung_OE_2020_final.pdf?m=1633415631&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Umwert/terklaerung_OE_2020_final.pdf?m=1633415631&amp;</a>
6.4a Reporting of Spills (immediate disclosure)	Conformance	The requirement to disclose to affected parties the volume, type and potential impact of significant Spills immediately after an incident is managed within the certified Environmental Management System of the Entity. Note: As witnessed by workers and management, environmentally significant spills did not happen in recent years.
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is not applicable, because as witnessed by workers and management, there hasn't been any environmentally relevant Spills in recent years.
6.5a Waste management and reporting (strategy)	Conformance	The document review, site tour and interviews confirmed that the Entity manages its wastes in accordance with the Waste Mitigation Hierarchy. The organisation achieved a high recycling rate of ca. 92% in 2020.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclosed its annual waste quantities in the organisation's Environmental Declaration. A copy of the report can be found via the following link: <a href="https://www.oetinger.net/de/PDF/Zertifikate/Umwert/terklaerung_OE_2020_final.pdf?m=1633415631&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Umwert/terklaerung_OE_2020_final.pdf?m=1633415631&amp;</a>
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 (state 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.

CRITERION	RATING	COMMENT
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 collects all Dross from its production process and feeds this back (via smelting in a tilting rotary drum furnace).
6.8b Dross (recycling)	Conformance	All Dross is being collected and processed in a furnace to extract the aluminium contained.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable, as (in line with local legislation), 100% of the Dross is gathered and recycled as confirmed by document review, interviews and a site tour.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified its water use. Only municipal water is obtained, which is mainly used for cooling purposes of the casting equipment.
7.1b Water assessment (risk assessment)	Not Applicable	This Criterion is not applicable, as the Entity is supplied only with municipal water and in quantities which are not significant to the watersheds. Note: The area where the Entity is operating does not suffer from water-scarcity.
7.2a Water management (management plans)	Conformance	Water related risks are managed within the Entity's Environmental Management System which is certified according ISO 14001. As a result of the risk assessment, the Entity determined that a dedicated water management plan is not required. Nevertheless, protection against spills is in place as part of the emergency plans.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment did not identify the need for a water management plan.

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7.3 Disclosure of water usage and risks	Conformance	The Entity has published data of its water withdrawal in its Environmental Declaration, see: <a href="https://www.oetinger.net/de/Zertifikate.php">https://www.oetinger.net/de/Zertifikate.php</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has commissioned and received a biodiversity assessment by an external consultant and implemented the recommendations given by the experts.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the recommendations from the recent biodiversity assessment were already implemented by the Entity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the recommendations from the recent biodiversity assessment were already implemented by the Entity.
8.2c Biodiversity management (reporting)	Conformance	The Entity has made information on the recent biodiversity assessment publicly available in its Sustainability Report 2020, see: <a href="https://www.oetinger.net/de/Zertifikate.php">https://www.oetinger.net/de/Zertifikate.php</a>
8.3 Alien Species	Conformance	The Entity has assessed the risk concerning Alien Species and monitors their presence. All Alien Species that might be hiding in the Aluminium Scrap will be prevented from being introduced to the local biodiversity during the production process.
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 mines)	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 commitment to Human Rights is stated in the OETINGER Company Policy and Company Guideline. Both documents are available via the links:

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		<a href="https://www.oetinger.net/de/PDF/Zertifikate/Unterne_hmensepolitik_2021_signed.pdf?m=1631869604&amp;">https://www.oetinger.net/de/PDF/Zertifikate/Unterne_hmensepolitik_2021_signed.pdf?m=1631869604&amp;</a> <a href="https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;">https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a documented Human Rights Due Diligence assessment. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews of workers and management during the audit. Indigenous People are not present in the region.
9.1c Human Rights Due Diligence (remediation)	Conformance	As confirmed by workers and management and according to the Human Rights Due Diligence assessment, the Entity has no salient adverse human rights impacts present. The Entity has not caused or contributed to adverse human rights impacts. Therefore, remediation is not needed.
9.2 Women's Rights	Minor Non-Conformance	The Entity ensures that both women and men receive equal pay for comparable work. However, the work force is male dominated and the efforts to ensure respect for the rights and interests of women are not fully effective, as there is no defined program in place to address the compatibility of family and job in light of the double burden of women and career, work place design or the risk of women being underrepresented in decision-making roles. Also, explicit images were posted in some rooms, as observed during the site tour.
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.

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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 are being considered or have taken 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.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity systematically evaluates their supplier pool and restricts itself from sourcing from Conflict-Affected and High-Risk areas.
9.9 Security practice	Conformance	The Entity's external security provider operates the gate during daytime and are on watch during the nights. The guards are unarmed. Interviews with security personnel, Workers and management confirmed that Human Rights are respected.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to unite freely in the Unions, seek representation and join the works council without interference. A freely elected Worker Representation (works council) is in place and is provided sufficient resources.

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10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to unite freely in the Unions, seek representation and join the works council without interference. A freely elected Worker Representation (works council) is in place and is provided sufficient resources.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	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 the country where the Entity is located.
10.2a Child Labour (minimum age)	Conformance	The document review, site tour and interviews with workers and their representatives confirmed that children or underage persons are not employed by the Entity.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of Child Labour. The youngest Worker was an adult. The Entity has committed to prohibit any child work according to their published Company Guidelines: <a href="https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;">https://www.oetinger.net/de/PDF/Zertifikate/2021_Unternehmens-Leitlinie.pdf?m=1631869431&amp;</a>
10.2c Child Labour (worst forms)	Conformance	As confirmed by a site tour and interviews, the Entity does neither use nor support the use of Child Labour and does not engage in or support the Worst Forms of Child Labour either.
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 a site tour, interviews and 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 Workers to lodge deposits or security payments 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 either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	A site tour, worker interviews and document review confirmed that the Entity does neither engage in,

CRITERION	RATING	COMMENT
		nor support, the use of Forced Labour. 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	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not restrict the freedom of movement of Workers in the workplace and the Entity does not offer on-site housing, as confirmed by interviews, the site tour and a document review.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	As confirmed by document review and interviews, the Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not detain original copies of Workers' identity papers, work permits, travel documents or training certificates.
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 (according to legal requirements and collective bargaining agreement, depending on the length of service), as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	<p>As confirmed by interviews and document review, the Entity does ensure equal opportunities and does not engage in or actively support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination.</p> <p>Due to the nature of the business (casthouse) the Entity has not yet been able to recruit any women to work in production although the Entity is addressing this by specifically including women in their job advertisements (as legally mandated).</p>
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. Worker representatives and management meet regularly. Various channels to make suggestions or raise concerns are in place.

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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.
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 or exceed the industry standard, as confirmed by document review and worker interviews. Working time, payment and leave are negotiated in collective bargaining agreements. The wages paid are substantially above the legal minimum. They are in line or above the industry standard.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented, as have been verified by document review and interviews during the assessment.
10.8 Working Time	Conformance	As confirmed by interviews and document review, the Entity abides to the legislation and rules set in the collective bargaining agreement regarding Working Time. Working Time is defined in the employment contracts. Maximum length of the working week is six consecutive days. A clocking-in system is in place. Records are on hand. It was also confirmed that there is no excessive overtime. The Entity respects public holidays and grants paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Company Policy and Company Guidelines both address the health and safety of the workers. The documents are endorsed by the top management.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's management confirmed that their Company Policy and Company Guidelines apply to all Workers, including Contractors. These documents are communicated internally and are available on the Entity's website: <a href="https://www.oetinger.net/de/Zertifikate.php">https://www.oetinger.net/de/Zertifikate.php</a>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has issued their Company Policy and Company Guidelines addressing health and safety. A commitment to comply with Applicable Law on Workers' health and safety, international standards,

CRITERION	RATING	COMMENT
		and ILO Conventions on Occupational Health and Safety is stated in the Company Guidelines: <a href="https://www.oetinger.net/de/PDF/Zertifikate/2021_09_Unternehmensleitlinie_V1.pdf?m=1635153047&amp;">https://www.oetinger.net/de/PDF/Zertifikate/2021_09_Unternehmensleitlinie_V1.pdf?m=1635153047&amp;</a>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right of Workers to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work is stated in the Entity's publicly available Company Guidelines: <a href="https://www.oetinger.net/de/PDF/Zertifikate/2021_09_Unternehmensleitlinie_V1.pdf?m=1635153047&amp;">https://www.oetinger.net/de/PDF/Zertifikate/2021_09_Unternehmensleitlinie_V1.pdf?m=1635153047&amp;</a> Workers have been trained accordingly.
11.2 OH&S Management System	Major Non-Conformance	The Entity has established a documented system to manage the safety of their Workers. The system is not certified according a recognized standard. The Entity did not demonstrate that the health aspects are adequately included in this Management System.
11.3 Employee engagement on health and safety	Conformance	The Entity demonstrated that joint health and safety committee meetings are held regularly to discuss and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	The Entity monitors and analyses regularly (on a monthly basis) its Occupational Health and Safety performance using leading and lagging indicators.

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

Revision	Date	Notes
0	12 November 2021	Initial Certification Audit - Provisional Certification