
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**ALVANCE
BRITISH
ALUMINIUM LTD**

CERTIFICATE
NUMBER

143

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

29 NOVEMBER 2021

DATE OF EXPIRY

28 NOVEMBER 2022

CERTIFIED SINCE

29 NOVEMBER 2021

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 smelting and casting of aluminium products at
Lochaber Smelter, United Kingdom.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALVANCE British Aluminium
ENTITY NAME	ALVANCE British Aluminium
CERTIFICATION SCOPE	The smelting and casting of aluminium products at Lochaber Smelter, United Kingdom.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">28 – 29 April 2021 (Remote) and 14 October 2021 (On-site)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 June 2021 (Remote) and 15 November 2021 (On-site)
AUDIT SCOPE	<p>The audit scope covers ALVANCE British Aluminium's Lochaber Smelter's operations, comprising of aluminium smelting and casting.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the commencement of the Audit (April 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit (14 October).</p>
AUDIT OUTCOME	Provisional Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

29 November 2021 – 28 November 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

28 May 2022

CERTIFICATE
NUMBER

143

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has a legal register in place for health, safety and environmental regulations. As regulations change, these are evaluated and recorded within the Management System and discussed at management meetings and the annual management review. Adequate training is provided through the Astute platform.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption, including Extortion and Bribery, through the implementation of its Working Principles and Procurement policies, and raises awareness of these principles using online training, which is mandatory for all employees.
1.3 Code of Conduct	Conformance	The Entity implements the ALVANCE Working Principles as the Code of Conduct, which integrates principles relevant to environmental, social and governance performance. The Code is communicated to employees during induction, is provided via email and made permanently available on the company intranet.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has developed a Health, Safety, Environmental and Quality Policy Statement, which is signed by the Managing Director and aligns with the environmental, social and governance practices of the ASI Performance Standard. The Entity has adopted the following international standards, including ISO 45001: 2018, ISO 9001:2015 and ISO 14001:2015, as a framework to implement and maintain an Integrated Management System for Health, Safety, Environment and Quality.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has demonstrated Senior Management endorsement for the HSEQ Policy and secures resources to implement the Policy. Management reviews include the Entity's environmental and social performance and investment plans. There are regular reviews of capital expenditure investments which address key environmental, social and governance issues included in the ASI Performance Standard. Senior Management interviews were conducted during the audit as evidence.

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2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its HSEQ Policy Statement through various channels, including email correspondence, intranet, notice boards and training. Relevant Policies are also communicated to employees and contractors during induction training (e.g. HSEQ Policy Statement, Major Accident Prevention Policy (MAPP) and Emergency Response).
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative, the Managing Director, as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard and documented these roles in its Management System.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity operates an Environmental Management System which is certified to ISO 14001:2015. Independent audits are carried out by an external auditor and the certificate is valid for the Entity's ASI Certification Period. The latest surveillance audit was undertaken in February 2021 during which two minor non-conformances were identified.</p> <p>The Entity has established a robust and well documented Integrated Management System, including the identification of significant environmental aspects and impacts, environmental risk assessment, monitoring and measurement and action planning, in line with local regulatory requirements.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity operates an Integrated Management System which is certified to ISO 9001:2015 and ISO 45001:2018. The Entity is subject to regular surveillance audits on these Management Systems by an external auditor.</p> <p>The Entity has established a robust and well documented Integrated Management System, including the identification of significant social aspects and impacts, risk assessment, monitoring and measurement and action planning, in line with local regulatory requirements.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has not integrated Responsible Sourcing Policy requirements covering environmental, social and governance (ESG) issues into the current policy framework. The Entity did not identify its ESG supply chain risks and associated due diligence processes. The current supplier environmental and social pre-qualification process excludes raw material suppliers, such as alumina and anode suppliers, as

CRITERION	RATING	COMMENT
		these are managed under the parent company's procurement process. Therefore, supply chain risks from these sourcing activities have not been evaluated by the Entity.
2.5 Impact Assessments	Conformance	<p>The Entity has conducted Impact Assessments for the proposed Recycling and Billet Casting Facility development. The Environmental Impact Assessment (EIA) Report was submitted with the planning application and included issues including</p> <ul style="list-style-type: none"> -Landscape and Visual Access -Traffic and Transport -Hydrology and Hydrogeology -Ecology -Air Quality -Noise -Socio-economic effects -Climate Change -Major Accidents and Disasters <p>The consultation process was held online at the following publicly accessible website: https://alvancealuminiumgroup.com/billet-plant-consultation</p>
2.6 Emergency Response Plan	Conformance	The Entity operates an Environmental Management System which is certified to ISO 14001:2015. The Entity's Emergency Response Plan is currently under consultation with stakeholders including the local fire department, ambulance and emergency services, environmental protection agency and employees.
2.7 Mergers and Acquisitions	Conformance	The Entity is 100% owned by GFG Alliance and all decisions related to mergers and acquisitions are made at that level.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity is 100% owned by GFG Alliance and any closure, decommissioning and divestment projects are made at that level and are not under the control of the Entity. In the case of a facility closure or divestment, a project team would be established to ensure ongoing compliance with Applicable Law.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	At present, the Entity does not report publicly on its governance approach and its material environmental, social and economic impacts, therefore a minor non-conformance has been raised. The Entity reports its environmental data in accordance with permit requirements to the local Scottish Environment Protection Agency, please see:

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		https://www.sepa.org.uk
3.2 Non-compliance and liabilities	Conformance	The Entity is classified as an Upper Tier COMAH site (Control of Major Hazard Regulations 2015) and therefore follows strict guidelines including public disclosures and potential enforcement action by the Health and Safety Executive (HSE). The Entity has mechanisms in place to publicly disclose information on any significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. Some improvement notices were received and managed, however they were not considered significant.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has requirements in place to ensure that any payments to governments made by, or on its behalf, have a solid legal and/or contractual basis. The Entity works against Corruption, including Extortion and Bribery, through the implementation of its Working Principles and procurement policies, and raises awareness of these principles using online training mandatory for all employees.
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 implements procedures to ensure that complaints, grievances and requests for information relating to its operations are investigated and adequate resolution mechanisms are followed. This is outlined in the Complaints Procedure and in the examples reviewed. The Entity operates an Environmental Management System which is certified to ISO 14001:2015.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Major Non-Conformance	ALVANCE British Aluminium has not yet undertaken Environmental Life Cycle Assessments for their major product lines as required by the ASI Performance Standard.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Major Non-Conformance	ALVANCE British Aluminium has not yet undertaken Environmental Life Cycle Assessments for their major product lines as required by the ASI Performance Standard.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity has not provided any public communication about Life Cycle Assessment (LCA) studies. However, where required, the Entity will publish this information upon completion of an LCA.

CRITERION	RATING	COMMENT
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity operates a robust Aluminium Process Scrap reduction and recycling plan and recycles 100% of internally generated scrap. The Entity implemented a continuous improvement programme with a target to reduce the amount of scrap generated, aligned with the ISO 9001 Management System. Metal inventory surveys and scrap balance sheets were reviewed during the audit. The Entity conducts regular internal meetings and maintains oversight of its remelting targets and progress.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity operates a robust Aluminium Process Scrap recycling plan and controls to separate aluminium alloys for recycling internally, aligned with the ISO 9001 Management System. Training materials related to remelting guidance for workshop workers were reviewed.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>Currently, the Entity has no capacity to remelt external scrap and any process scrap from products generated at customer sites are recycled at their facilities. However, recycling of scrap material is a key pillar of future projects for billet production with recyclable scrap material constituting the main feedstock for this production.</p> <p>The proposed development comprises an aluminium recycling and billet casting facility with capacity to produce up to 100,000 tonnes per annum of aluminium billet using recycled aluminium (65k tonnes) and primary aluminium (35k tonnes) from the existing Smelter. The project will increase local and regional recycling rates of metals containing aluminium, and contribute to circular economy objectives in the local region.</p> <p>According to the Entity's plans, the billet production facility will be operational by January 2024 (subject to securing the appropriate permissions). Further information about the plans can be viewed via the local authorities' website: https://wam.highland.gov.uk/wam/applicationDetails.do?activeTab=documents&keyVal=QTAQIEIHHI00</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	The Entity currently does not engage with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products containing Aluminium, as required by the ASI Performance Standard.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity reports GHG emissions and energy use by source on a regular basis to the Scottish Environment Protection Agency (SEPA). The Entity's GHG emissions under its EU Emissions Trading System (ETS) permit are Third Party verified by DNV on an annual basis. The Entity established a GHG emissions management plan and is monitoring and reporting its GHG emissions. The EU ETS Verification Report, GHG emissions data and calculations were reviewed during the audit. For further information, please see: https://www.sepa.org.uk This information is available upon stakeholder request.
5.2 GHG emissions reductions	Minor Non-Conformance	Whilst the Entity has established a GHG Emissions Management Plan under EU Emissions Trading System (ETS) requirements, these do not currently include quantifiable and time-bound emission reduction targets as required by the ASI Performance Standard.
5.3a Aluminium Smelting (management system)	Conformance	The Entity maintains a Management System to limit Direct GHG emissions and is regularly audited against EU Emissions Trading System (ETS) verification requirements by DNV. The Entity has an energy efficiency programme in place which is regularly reviewed.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity's carbon intensity figure for GHG Scope 1 and 2 emissions was 1.6 tonnes of CO ₂ -eq per tonne of hot metal in 2020, which is below the 8 tonnes CO ₂ -eq per tonne threshold set by the ASI Performance Standard. The Entity's GHG emissions are independently verified under the EU Emissions Trading System (ETS) according to permit requirements.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Smelter has been in operation since 1929, therefore this Criterion is not applicable.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard air emissions requirements and are in compliance with the legal permit thresholds on air emissions. Emissions to Air are also disclosed to the Scottish Environmental Protection Agency (SEPA) on a regular basis. The

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		<p>Entity has implemented continuous monitoring and daily assessment of material emissions to air, such as fluoride emissions, and measures emissions based on stack sampling. The Entity has implemented abatement projects, such as bag filters installation, to achieve continuous improvement and to continue to reduce Emissions to Air.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard Discharges to Water requirements and maintains a Management System certified to ISO 14001:2015 requirements. All water discharge values have been below permit levels as monitored at the downstream monitoring point. The Entity's Water Management Plan identifies and characterises the surface and subsurface water resources which could impact or be impacted by the Smelter's activities, including cumulative demands within the catchments. These include an assessment of quality and quantity, the requirements of water dependent environments, biodiversity and ecosystem services.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has developed, implemented and maintained systems, procedures and processes that conform to the ASI Performance Standard requirement for the assessment and management of Spills and Leakage. A soil and groundwater monitoring plan is currently being reviewed by the local authority, Scottish Environment Protection Agency (SEPA). The assessment and development of the Entity's monitoring plan was undertaken by an expert Third Party.</p> <p>The assessment of Spills and Leakage is also governed by the Entity's ISO 14001 certified Environmental Management System. No major Spills or Leakage occurred in 2020.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard requirement for the assessment and management of Spills and Leakage. The Entity maintains a hazardous substance register, as well as a contamination and waste management control procedure according to its ISO 14001 compliant Management System. The Entity's external communication plans are detailed in its Emergency Response Plan and are regularly reviewed internally as well as with external stakeholder input.</p>

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity maintains an incident reporting procedure for Spills and Leakage and has defined a chain of internal and external notification flows in its Emergency Response Plan. There were no major Spills or Leakage events in 2020/21.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity regularly reports its environmental performance to the local authorities, such as the Scottish Environment Protection Agency (SEPA). Any major Spill would be reported as per the Emergency Response Plan's major incident notification flow. There were no major Spills or Leakage events in 2020/21.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and maintains a waste management procedure which is aligned to the Waste Mitigation Hierarchy. The implementation and effectiveness of this procedure is assessed during scheduled internal audits. Verification assessments of contractors who transport or recycle waste materials, and any external facilities used for treatment, storage and disposal of waste and hazardous materials are regularly performed to confirm that waste is being managed in accordance with the agreed contract and the contractor's operating license.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste generated by the Entity and associated waste disposal methods are regularly disclosed to the local authority, the Scottish Environment Protection Agency's (SEPA) Scottish Pollutant Release Inventory (SPRI). This information is available upon stakeholder request.
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.

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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)	Conformance	Spent Pot Lining (SPL) is stored in the material transfer building which is dry, under cover and managed according to the Entity's PPC (Pollution Prevention and Control) license. An environmental risk assessment has been carried out by the Entity using external consultants. SPL operations are undertaken by third party contractors. The material transfer building is subject to monthly audits to ensure that activities in and around the building are being controlled.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Minor Non-Conformance	The Entity is currently sending its SPL carbon and brick materials to landfill via an authorised landfill operator. The Entity is working with third party experts and is seeking alternative providers to recycle the SPL for use in other industries (such as steel and cement). The Entity has carried out a due diligence audit at the landfill operator's site to ensure SPL, as a hazardous material, is treated and landfilled, avoiding any leachate to soil, groundwater or aquatic environments.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity holds untreated SPL under cover in the designated material storage area as per permit requirements and sends the SPL to the landfill operator for treatment and landfilling. The Entity has undertaken due diligence checks of the landfill operator to ensure regulatory requirements are met. The treatment process stabilizes the waste using Air Pollution Control Residues (APCR) to remove the fluoride. Data shows this is successful on the carbon and brick. The Entity is currently evaluating alternative options to landfilling and works with experts and third parties on pilot projects.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity is currently evaluating alternatives to landfilling of treated SPL and has commissioned pilot projects with relevant experts to determine suitable solutions and apply for funding. Proposals for the work and the objectives of the pilots were reviewed during the audit. The cement industry is interested in the treated material as a feedstock and are investigating whether the fluoride content is beneficial for their process to reduce energy usage.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity has a designated storage facility for the storage of SPL that meets Scottish Environment Protection Agency (SEPA) guidelines and prevents

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		the discharge of SPL to aquatic environments. The area was inspected by the Auditor during the on-site audit.
6.8a Dross (recovery)	Conformance	The Entity has a Dross press operational procedure in place. The Entity has tolling arrangements in place with external Dross processors and expects a 45-50% aluminium recovery from the Dross. Aluminium Dross quantities are regularly monitored by the Entity as part of its ISO 9001 certified Management System.
6.8b Dross (recycling)	Conformance	The Entity has tolling arrangements in place with external Dross processors and expects a 45-50% aluminium recovery from the Dross. The Entity's contracts with external partners were reviewed during the audit. The Entity works with external partners to maximize the recovery of aluminium from Dross and Dross residues.
6.8c Dross (review of alternatives)	Conformance	The Entity does not send any Dross or Dross residues to landfill. Current tolling arrangements with external providers maximise the recovery of aluminium from Dross and Dross residues are processed with no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity receives all water input for operational processes from the hydroelectric power station. The hydroelectric plant's feed water is reported to the local authority as per license requirements on an annual basis. The Entity maintains a Water Management Plan, however it does not currently monitor its water balance as water meter readers are not installed.
7.1b Water assessment (risk assessment)	Minor Non-Conformance	The Entity maintains a Water Management Plan which identifies the hydrography, Lochaber Catchment Area, protected areas and climate characteristics. However, the impacts of smelting operations and the hydroelectric power station on the local catchment area have not been considered.
7.2a Water management (management plans)	Minor Non-Conformance	The Entity has established a Water Management Plan, however it does not include time-bound targets that address the key water-related risks.
7.2b Water management (monitoring)	Minor Non-Conformance	The Entity currently does not monitor the effectiveness of the Water Management Plan, as required by the ASI Performance Standard. An

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		internal audit schedule is proposed for the Water Management Plan from 2022.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Entity reports the hydroelectric power station feed water annual consumption data to the local authorities. However, the reporting does not detail any material risks or the ongoing monitoring activities.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity uses its comprehensive Land Use Management Plan and Environmental Impact Assessments to assess the risks and materiality of the impacts on biodiversity from the land use and activities in its Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	The Entity's biodiversity assessments contain recommended action plans however these are not actively implemented or monitored.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Minor Non-Conformance	The Entity's Environmental Impact Assessments (EIA) applies the Biodiversity Mitigation Hierarchy tool to help manage biodiversity risk. However, the action plans derived from the Entity's biodiversity assessments are not actively implemented or monitored.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	The Entity is currently developing a public website that will include sustainability reporting. However, at present the Entity does not report on outcomes from biodiversity action plans.
8.3 Alien Species	Conformance	The Entity has measures in place to prevent the accidental or deliberate introduction of Alien Species that could have a significant adverse impact on biodiversity, with a focus on wooden pallets used for transporting anodes.
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.

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PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity demonstrates a commitment to respect Human Rights primarily through the Working Principles and the Anti-Slavery Policy. These Policies are communicated to employees during the induction process and to suppliers through the procurement policies and procedures.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has a Human Rights commitment and related policies. However, the Entity could not provide evidence that a Human Rights Due Diligence process has been conducted to identify, document and assess the potential for Human Rights-related issues resulting from its activities.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has incorporated Human Rights in its Working Principles policy. It has not had any Human Rights complaints to date however it has the mechanisms in place to manage those if they arise, notably the Community Complaints Procedure and the Employee Grievance Procedure.
9.2 Women's Rights	Conformance	The Working Principles and the Equality, Diversity and Inclusion Policy outline the Entity's commitment to enhancing women's rights. The Entity is also highly involved in a Women's Network, has internal mechanisms to ensure equality for all employees, has women in senior management positions and is actively promoting the role of females in engineering at local schools.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous People, lands, territories or resources in the Area of Influence of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous People, lands, territories or resources in the Area of Influence of the Entity.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented a Land Use Management Plan which appropriately identifies Sites of Special Scientific Interest (SSSI) and has provisions to take action to avoid or remedy any impacts.
9.6a Resettlements (avoid or minimise)	Not Applicable	Management interviews were conducted and multiple Historical Ordnance Survey maps from the Land Use Management Plan were reviewed, confirming there have been no Resettlements as a result of the Entity's establishment or operation.
9.6b Resettlements (where unavoidable)	Not Applicable	There have not been Resettlements as a result of the Entity's establishment or operation.

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9.7a Local Communities (rights and interests)	Conformance	The Entity has identified the local Communities and undertakes meaningful engagement with stakeholders regarding existing and proposed developments. Consultation and information events are held where feedback on proposals is gathered, analysed and taken into consideration; successful examples include the Pre-Application Consultation (PAC) for the proposed Recycling and Billet Casting facility.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate measures to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. It does so notably through consultations for development projects that affect local Communities and which include public consultation processes. Successful examples include the Pre-Application Consultation (PAC) for the proposed Recycling and Billet Casting facility.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with local Communities the opportunities to respect and support their livelihoods. It does so notably through consultations for development projects that affect local Communities and which include public consultation processes. Successful examples include the Pre-Application Consultation (PAC) for the proposed Recycling and Billet Casting facility.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has systems in place to ensure it does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas, notably through the Working Principles, the Procurement Procedure and the Supplier Evaluation and Management Procedure.
9.9 Security practice	Conformance	The Entity respects Human Rights in line with recognised standards and good practices, in its involvement with public and private security providers. This is ensured by the implementation of the provider's Security Assignment Instructions.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a strong union presence on site and Employees and Management appear to have a positive working relationship with the Union. The Entity demonstrates its commitment to respecting the rights of Workers to associate freely in Labour Unions through its approach outlined in the ALVANCE Working Principles and the Union Partnership Agreement. Those policies and

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		procedures are based on the UN Guiding Principles for Business and Human Rights and in line with Applicable Law.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collective bargaining. Principles are outlined in the Union Partnership Agreement. The Entity's approach appears to be effective, and the workforce shows active participation.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity respects the rights of Workers to freedom of association and collective bargaining and therefore alternative means are not required and this Criterion is considered not applicable.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use nor support the use of Child Labour as defined in ILO Conventions and complies with related national and international law. This commitment is stated in the ALVANCE Working Principles and there are strong processes implemented during recruitment to prevent this risk.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour. This commitment is stated in the ALVANCE Working Principles. The Entity works with apprentices who are above 18 years old and processes are implemented to ensure they do not carry out hazardous tasks.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support Worst Forms of Child Labour. This commitment is stated in the ALVANCE Working Principles and reinforced by internal processes.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in or support Human Trafficking as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity's commitment is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment and throughout employment.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment to prevent this.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not employ Migrant Workers and does not require any employee to lodge deposits or

CRITERION	RATING	COMMENT
		security payments at any time. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment to prevent this.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles, and processes are implemented during recruitment to prevent this.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not hold workers in Debt Bondage or force them to work in order to pay off a debt. The Entity does not restrict the freedom of movement of workers in the workplace and does not have on-site housing. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles and implemented by the management team.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain originals or copies of Workers' identity papers, work permits, travel documents or training certificates, and follows General Data Protection Regulation (GDPR) requirements. The Entity's commitment to combat Forced Labour in all its forms is outlined in the ALVANCE Working Principles and enforced by the management team.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity commitment to combating Forced Labour is outlined in the ALVANCE Working Principles. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length. Employment contracts include a Termination of Employment section which clearly outlines the Workers' rights and duties in line with legislation.
10.4 Non-Discrimination	Conformance	The Equality, Diversity and Inclusion Policy outlines the Entity's commitment to encouraging equality, diversity and inclusion among the workforce, and eliminating unlawful Discrimination in hiring, salary, promotion, training, advancement opportunities or termination. Human Resources Managers also encourage diversity in the workforce, especially the application of more female workers, by promoting the Entity's activities through diverse channels including local schools.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers through the “Daily Information Centre” updates, regular meetings (Union, Safety representatives, HSEQ) and comprehensive newsletters which are accessible through multiple channels.
10.6 Disciplinary practices	Conformance	The Entity’s Disciplinary policy details the disciplinary process, and the ALVANCE Working Principles confirm the Entity’s commitment to respecting Human Rights. It was confirmed that the Entity does not engage in or 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 Collective Bargaining Agreement together with UK regulations assure compliance with this requirement. Remuneration policies are regularly benchmarked against industry average to ensure the Entity remains a competitive employer in the market.
10.7b Remuneration (method of payment)	Conformance	The Collective Bargaining Agreement (CBA) together with UK regulations assure compliance with this requirement. All workshop Workers are under the CBA, which assures that no pay is withheld and that all payments are made monthly directly to chosen bank accounts. There are no Disciplinary processes which result in withholding of payment.
10.8 Working Time	Conformance	Scottish Applicable Law and the Collective Bargaining Agreement (CBA) have resulted in a rigorous on-site process whereby staff are not allowed to exceed the maximum extra shifts and total working hours per month. Public holidays, Overtime hours, sick leave and annual leave are remunerated according to Scottish Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm DNV, took place in February 2021.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity applies the Occupational Health and Safety Policy to all Workers and Visitors present in any area or activities under the Entity’s control. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm, DNV, took place in February 2021.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity includes in the Occupational Health and Safety Policy a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety including where relevant ILO Conventions 155 and 176. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm, DNV took place in February 2021.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity includes in the Occupational Health and Safety Policy that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm, DNV took place in February 2021.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm DNV, took place in February 2021.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism, such as a joint health and safety committee, by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm DNV, took place in February 2021.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance using lagging and leading indicators, compares performance with peers and best practices where available, and strives to continuously improve. The Entity operates an Integrated Management System which is certified to ISO 45001. The latest surveillance audit, carried out by independent audit firm DNV, took place in February 2021.

Document Control and Version History

Revision	Date	Notes
0	29 November 2021	Initial Certification Audit - Provisional Certification