
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

KAISER ALUMINUM WARRICK LLC

CERTIFICATE
NUMBER

129

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

ERM
CERTIFICATION
AND
VERIFICATION
SERVICES

DATE OF ISSUE

16 FEBRUARY 2022

DATE OF EXPIRY

15 FEBRUARY 2025

CERTIFIED SINCE

17 MAY 2021

AUTHORISED BY

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

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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

Ingot casting, rolling mills and final production at the
Kaiser Aluminum Warrick LLC facility in the United
States of America (USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kaiser Aluminum Corporation
ENTITY NAME	Kaiser Aluminum Warrick LLC
CERTIFICATION SCOPE	Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (21 March 2021)• Surveillance Audit (1 – 5 November 2021)
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">• 21 March 2021 (Initial Certification Audit)• 1 – 5 November 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 1 April 2021 (Initial Certification Audit)• 20 January 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 March 2021)</u></p> <p>The audit scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the audit (March 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>

Surveillance Audit (1 – 5 November 2021)

The audit scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

16 February 2022 – 15 February 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

15 August 2023

CERTIFICATE
NUMBER

129

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to maintain awareness of and ensure ongoing compliance with applicable laws.
1.2 Anti-Corruption	Conformance	The Entity has implemented Policies and procedures to ensure it works against Corruption in all its forms, including Extortion and Bribery, consistent with applicable law and prevailing international standards. Corporate level Policies and practices have been implemented and local management of internal and external partnerships ensure Due Diligence and integrity through detailed compliance reporting.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that includes principles relevant to environmental, social and governance performance. The corporate level Code of Conduct is communicated locally and incorporated to essential training and contractual needs to ensure awareness and ongoing compliance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains integrated and stand-alone Policies that are consistent with the environmental, social, and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management endorses, supports through provision of resources and regularly reviews their Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates their Policies internally and externally as appropriate.
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity documented and implemented an Environmental Management System, based on the ISO 14001 Standard.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity documented and implemented a Social Management System.

CRITERION	RATING	COMMENT
2.4 Responsible Sourcing	Conformance	The Entity implemented a responsible sourcing Policy covering environmental, social and governance issues.
2.5 Impact Assessments	Conformance	The Entity has implemented processes and procedures that assesses the environmental, social, cultural and Human Rights impacts, for new projects or major changes to existing facilities that may arise. This includes a Project Environment, Health and Safety Review (PEHSR) to assess the potential impact to the environment and the health or safety, Local Community and culture and heritage. This is supported by the need for a Human Rights assessment that is being implemented in all facilities.
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected stakeholders groups such as Communities, Workers and their representatives and relevant agencies. Drills and critiques are regularly conducted by third-parties.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers, acquisitions and divestments.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers, acquisitions and divestments.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity via its corporate group company, publicly discloses its governance approach and its material environmental, social and economic impacts and performance. This information is published annually in the Sustainability Report that includes consolidated data: https://www.kaiseraluminum.com/files/misc/2020_Sustainability_Report.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity via its corporate annual financial and sustainability reporting, publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable law.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has established processes and procedures to ensure that only payments to governments on a legal and/or contractual basis are made and that all other payments adhere to strict internal policy and approval.

CRITERION	RATING	COMMENT
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 processes and procedures to ensure that stakeholder complaints, grievances, resolution and requests for information are being met and that the mechanisms for doing so are accessible, transparent, understandable and culturally and gender sensitive, where required.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's former owner/operator conducted a Life Cycle Assessment (LCA) in 2020 of their Rolling Operation's 2019 average finished product, for which Aluminium is used, to evaluate its life cycle impacts. There were no changes to the product or operations, therefore the LCA remains valid.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's Life Cycle Assessment (LCA) of their Rolling Operation's average finished product, for which Aluminium is used, to evaluate the product life cycle impacts. Upon customer request, the Entity's Sales Director provides the 2020 cradle-to-gate LCA information.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's Life Cycle Assessment (LCA) of their Rolling Operation's average finished product, for which Aluminium is considered or used, evaluated the product life cycle impacts. The study is made publicly available if requested and includes its scope and underlying assumptions and limitations, including system boundaries.
4.2 Product design	Not Applicable	The Entity is not involved in material conversion and/or manufacture or sale of consumer/commercial goods containing Aluminium, therefore is not involved in the design and development process of the product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimizes the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity seeks to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established a strategy and approach that minimises the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of scrap for collection, recycling and/or

CRITERION	RATING	COMMENT
		re-use. All Process Scrap is segregated and labelled to ensure re-use is compatible and optimised. The Entity has little or no influence on consumer end-of-life scrap but is proactive in initiatives to increase collection and recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages locally and regionally through its global partnership with The Recycling Partnership, and its participation in national collection and recycling systems to support efforts to increase recycling rates for products containing Aluminium. This is supplemented by other local initiatives, although the Entity has limited influence over end-of-life material.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity had only recently purchased the site at the time of the Certification Audit and is not yet publicly disclosing its GHG emissions and energy use, although this is measured and monitored for future disclosure when a full reporting cycle completes.
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets at the corporate level, together with data on site-level GHG reduction initiatives that contribute to the overall performance: https://www.kaiseraluminum.com/files/misc/2020_Sustainability_Report.pdf
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 quantifies and reports its Emissions to Air. The regulatory authority concluded that there are no adverse impacts on humans or the environment from the Entity's operations, therefore the Entity does not implement mitigation plans.
6.2 Discharges to Water	Conformance	The Entity under its regulatory obligations, quantifies and reports Discharges to Water that could have adverse effects on humans or the environment, and implements plans to minimize these adverse impacts.

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts an assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. This is required under its Indiana Department of Environmental Quality Title V Permit and contractual obligation to its Lessor's NPDS Permit.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has external communication plans, compliance controls and a monitoring programme in place to prevent and detect any Spills and Leakage, and management is notified if an incident were to occur. This is required by the Entity's regulatory obligations and contractual obligations under its Lease Agreement.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity discloses to affected parties the volume, type and potential impact of significant Spills immediately after an incident. This is required by the Entity's regulatory obligations and contractual obligations under its Lease Agreement.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity discloses impact assessments of Spills and remediation actions taken and will report publicly on an annual basis from 2021 onwards. This is required by the Entity's regulatory obligations and contractual obligations under its Lease Agreement.
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The Entity's Waste Management Metrics are used to identify opportunities for waste mitigation and minimization. The Entity is required by their regulatory authority to implement a waste minimization program, enforced through annual regulatory audits.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity had only recently purchased the site at the time of the Certification Audit and is not yet publicly disclosing its quantity of Hazardous and Non-Hazardous Waste generated, and associated waste disposal methods, although this is measured and monitored and it will be reported publicly on an annual basis from 2022.
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.

CRITERION	RATING	COMMENT
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of Aluminium by treatment of Dross and Dross residues through the use of a third-party for recovery, where the recovery yield is monitored.
6.8b Dross (recycling)	Conformance	The Entity maximizes the recovery of Aluminium by treatment of Dross and Dross residues through implementation of processes for on-site management of Dross, transportation of Dross, selection of Dross processors and management of Dross residues. The Entity uses a third-party for recovery and to monitor the recovery yield.
6.8c Dross (review of alternatives)	Conformance	The Entity reviews alternative options to landfilling of its Dross residues. The results were supported by the Aluminium Association which provides global standards, industry statistics and expert knowledge to member companies and policy makers in the United States.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water withdrawal and use by source and type, to ensure sustainable management and protection of water resources and

CRITERION	RATING	COMMENT
		ecosystems in and around its environment and adopts a catchment-based approach for this. This is contractually required by its Lessor and authority.
7.1b Water assessment (risk assessment)	Conformance	The Entity assesses water-related risks in watersheds in the Entity's Area of Influence. A Water Risk Assessment was conducted in conjunction with the regulatory authority and no adverse impacts to the watershed were discovered during the assessment. This is contractually required by its Lessor and authority.
7.2a Water management (management plans)	Not Applicable	A Water Risk Assessment was conducted in conjunction with the regulatory authority and no adverse impacts to the watershed were discovered during the assessment.
7.2b Water management (monitoring)	Not Applicable	A Water Risk Assessment was conducted in conjunction with the regulatory authority and no adverse impacts to the watershed were discovered during the assessment, and therefore no plans or subsequent monitoring were applicable.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Entity had only recently purchased the site at the time of the Certification Audit and is not yet publicly disclosing its water withdrawal and use and material water-related risks, although this is measured and monitored and it will be reported publicly on an annual basis from 2022.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	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. It applies the corporate biodiversity framework for this purpose, using a mitigation hierarchy of avoidance, minimization, mitigation and offset to manage any identified material risk to biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's Biodiversity Risk Assessment has determined that there are no material risks within the Rolling Mill Facility's Area of Influence, therefore no action plans are required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity Risk Assessment has determined that there are no material risks within the Rolling Mill Facility's Area of Influence, therefore no action plans are required.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	The Entity shares the results of its biodiversity outcomes with stakeholders, and periodically updates and reports publicly on an annual basis.
8.3 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. Its predecessor conducted a comprehensive Biodiversity Risk Assessment of the Rolling Mill Facility to assess the risks and materiality of the impacts on biodiversity from the land use and activities in its Area of Influence. This assessment determined that activities do not deliberately introduce Alien Species and that there are no known negative impacts on biodiversity.
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 observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including a Policy commitment to respect Human Rights, a Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights, and as such impacts are identified, provides for remediation through legitimate processes.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including a Policy commitment to respect Human Rights, a Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights, and as such impacts are identified, provides for remediation through legitimate processes.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to

CRITERION	RATING	COMMENT
		its business, including a Policy commitment to respect Human Rights, a Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on human rights, and as such impacts are identified, provides for remediation through legitimate processes.
9.2 Women's Rights	Conformance	The Entity implements Policies and processes to ensure respect for the rights and interests of Women consistent with international standards and conventions.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous People in or adjacent to the Entity's Area of Influence, therefore there is no need for a specific Policy or processes to address the needs of Indigenous People.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous People in or adjacent to the Entity's Area of Influence, y, therefore there is no need for a specific Policy or processes to address the needs of Indigenous People.
9.5 Cultural and sacred heritage	Not Applicable	The Entity has adopted the Human Rights Policy of the previous site owner, ASI certification holder that establishes its recognition of and respect for the diversity, cultures, customs and values of the people in communities where it operates and takes into account needs, concerns and aspirations regarding their respective heritage and traditions. The Entity occupies a fixed site that does not have sacred or cultural heritage implications within its boundaries.
9.6a Resettlements (avoid or minimise)	Not Applicable	There has been no physical and/or economic displacement resulting from the establishment of the Entity and therefore no need to consider feasible alternatives to avoid or minimise physical and/or economic displacement.
9.6b Resettlements (where unavoidable)	Not Applicable	There has been no physical and/or economic displacement resulting from the establishment of the Entity and therefore no need to develop a Resettlement Action Plan.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. A corporate engagement process is used by the Entity, which is enhanced through a Community and Advisory Board, and customised to serve the interests of its local and regional stakeholders.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The Entity respects legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. A corporate engagement process is used by the Entity, which is enhanced through a Community and Advisory Board, and customised to serve the interests of its local and regional stakeholders.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with Local Communities the opportunities to respect and support their livelihoods. A corporate engagement process is used by the Entity, which is enhanced through a Community and Advisory Board which is customised to serve the interests of its local and regional stakeholders.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented Policies and processes to avoid any contribution to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas through management of its supply chain, both at the corporate and local level. The Entity is not located in a Conflict-Affected and High-Risk Area and follows all appropriate corporate and additional local processes.
9.9 Security practice	Not Applicable	The Entity does not utilize public or employ private security providers.
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 associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under applicable law, which is governed in this by national and state law and in line with the ILO Conventions C87 and C98.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collective bargaining, participate in any collective bargaining process in good faith to the extent possible under applicable law, and adhere to collective bargaining agreements where such agreements exist.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Applicable law in the Entity's country does not restrict the right to freedom of association and collective bargaining, and supports alternative means of association for Workers that are permitted under applicable law, where this may be required.
10.2a Child Labour (minimum age)	Conformance	The Entity neither uses nor supports the use of Child Labour, and complies with related national and international law. The Entity's Human Rights Policy

CRITERION	RATING	COMMENT
		makes reference to accepted labour practices, but does not specifically refer to hazardous or worst forms of Child Labour, neither of which are relevant at Rolling Mill Facility.
10.2b Child Labour (hazardous)	Conformance	The Entity does not use or support the use of Child Labour and complies with related national and international law.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use or support the use of Child Labour and complies with related national and international law, including not engaging in or supporting Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105, including supporting forms of Forced Labour including Human Trafficking, deposit, fee or other security payment, debt of identity paper bondage, freedom of movement or freedom to terminate employment without penalty.
10.4 Non-Discrimination	Conformance	The Entity established processes that ensure equal opportunities and no engagement or support of discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, age. Corporate Policies on equal employment opportunities, Human Rights and the Code of Ethical Conduct are reinforced at the local level by the Collective Bargaining Agreement.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues. This is undertaken via a number of mechanisms that ensure there is no threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. This is undertaken through a number of mechanisms across the workforce to ensure this.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week shall always meet at least a legal or industry minimum standard. The wages paid are in excess of the US national minimum wage, sufficient to meet the basic needs of Workers, and to provide some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week shall always meet at least a legal or industry minimum standard. The wages paid are in excess of the US national minimum wage, sufficient to meet the basic needs of Workers and to provide some discretionary income. Payments are made in a timely manner, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity has implemented Policies and processes to comply with applicable law and industry standards on working time, including overtime working hours, public holidays and paid annual leave. The Entity has implemented a Collective Bargaining Agreement (CBA) negotiated with employees via union representation and reviewed on a regular basis to ensure Workers are protected in terms of working hours, including overtime, public holidays and paid annual leave. Overtime payment is negotiated by employees.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented, communicates and regularly reviews its Occupational Health and Safety Policy that senior management has endorsed and supports through the adequate provision of resources.
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 their control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy includes a commitment to comply with all applicable environmental, health and safety laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Policies and practices include that Workers have the right to understand the hazards and safe practices of their work, and the authority to refuse or stop unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is routinely independently audited for conformance with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity is contractually obligated to provide Workers with a mechanism by which they can raise, discuss and participate in the resolution of occupational health and safety issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its occupational health and safety performance using lagging and leading indicators, compare this with peers and best practices where available, and strive to continuously improve.

Document Control and Version History

Revision	Date	Notes
0	29 April 2021	Initial Certification Audit – Provisional Certification
1	16 February 2022	Surveillance Audit – Full Certification