
**ASI CERTIFICATION
PERFORMANCE
STANDARD**



PRESENTED TO

**ALVANCE
ALUMINIUM
DUFFEL BV**

CERTIFICATE
NUMBER

31

ASI
STANDARD

**PERFORMANCE
STANDARD
(V2 2017)**

CERTIFICATION
LEVEL

**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITOR

**BUREAU
VERITAS
CERTIFICATION**

DATE OF ISSUE

31 JULY 2019

DATE OF EXPIRY

30 JULY 2022

CERTIFIED SINCE

31 JULY 2019

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Production of high end aluminium flat rolled products
in the Alvance Aluminium Duffel facility (Belgium) for
automotive, transport, building and niche markets.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALVANCE Aluminium Duffel BV
ENTITY NAME	ALVANCE Aluminium Duffel BV
CERTIFICATION SCOPE	Production of high end aluminium flat rolled products in the Alvance Aluminium Duffel facility (Belgium) for automotive, transport, building and niche markets.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">● Casthouses● Aluminium Re-melting/Refining● Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">● Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">● Initial Certification Audit (24 – 25 April 2019)● Surveillance Audit (24 January 2022) (Following acquisition of the Entity (formerly Aleris Aluminum Duffel BVBA) by Alvance Aluminium Duffel BV on 30 September 2020)
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">● 24 – 25 April 2019 (Initial Certification Audit)● 24 January 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">● 17 May 2019 (Initial Certification Audit)● 4 March 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 April 2019)</u></p> <p>Aleris Aluminum Duffel BVBA is a mill in Belgium that provides automotive body sheet and General coil and sheet products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">● Casthouses● Aluminium Re-melting/Refining● Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (24 January 2022)

Alvance Aluminium Duffel BV is a mill in Belgium that provides automotive body sheet and general coil and sheet products.

Supply chain activities included in the audit scope:

- Casthouses
- Aluminium Re-melting/Refining
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

The Surveillance Audit was undertaken as a 'desktop' exercise due to the close proximity to the scheduled Re-Certification Audit (July 2022) and ongoing COVID-19 travel limitations present at the time of the audit.

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

31 July 2019 – 30 July 2022

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

30 July 2022

CERTIFICATE
NUMBER

31

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Governance is a shared responsibility between the site and central functions of the group. Alvance Aluminium Duffel BV has a legal department; annual audits are conducted. A complete economic and financial information report is available on the website of the national bank of Belgium.
1.2 Anti-Corruption	Conformance	The Entity has a detailed Code of Conduct that contains business practices and procedures relating to Corruption and Bribery. All white-collar workers have to participate in and pass regular e-learning. A global compliance hotline exists.
1.3 Code of Conduct	Conformance	The Entity has an internal and an external Code of Conduct and refers to it on its website and in its sustainability reports. An external hotline for compliance is communicated: www.MySafeWorkplace.com
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an Integrated Management System for environmental, social and governance compliance. Several Policies exist and are translated in various languages (Code of Conduct, Health, Safety, Security and Environment Policy etc.), the implementation is monitored through the internal auditing system.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	There is a strong commitment from management to the implementation of the Management Systems. External audits and evaluations take place to verify the effective implementation of the systems, both by certification bodies and public authorities.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are communicated externally on the website and internally at the plant. Main achievements are communicated in the publicly available Sustainability Report: https://alvancealuminiumduffel.be/downloads The OH&S Policy can be found at: https://alvancealuminiumduffel.be/downloads
2.2 Leadership	Conformance	The global Vice President for Health, Safety and Environment has responsibility for ASI at group level; the responsibility for ASI implementation at the Entity is delegated to a senior local manager.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds a valid ISO 14001:2015 certificate, based on a well implemented Environmental Management System.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has Social Management Systems implemented, covering health and safety as well as work related issues. Several trade unions are present at the Entity and Worker representatives participate in meetings and committees. Periodic external audits are conducted by public authorities.
2.4 Responsible Sourcing	Conformance	All suppliers are evaluated on risks concerning social, safety, governance and environmental issue.
2.5 Impact Assessments	Conformance	Impact Assessment is covered by the Risk Analysis which is part of the Environmental and Occupational Health and Safety Management System. The Risk Analysis is carried out on a regular basis and in the case of an occurrence or change.
2.6 Emergency Response Plan	Conformance	An effective Emergency Response Plan is in place. It was developed together with internal and external experts in consent with local operational forces.
2.7 Mergers and Acquisitions	Conformance	Mergers and acquisitions are the responsibility of Alvanco/GFG global, not the Entity. It is stated in the Code of Ethics, that in the case of potential mergers and acquisitions both local and international laws and regulations must be fulfilled.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestment are the responsibility of Aleris global and are executed at local level. In the case of a recent temporary shutdown due to the acquisition of Aleris Duffel BV by Alvanco Aluminium Duffel, some staff members were retained.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity recently published the Sustainability Report 2020 – Towards Green Aluminium: https://alvancoaluminiumduffel.be/downloads
3.2 Non-compliance and liabilities	Conformance	The Entity has well established systems to avoid legal non-compliances and liabilities. The Entity states in its Sustainability Report 2020 that in 2020 investigations have commenced following registered complaints by the neighbours, see page 25: https://alvancoaluminiumduffel.be/downloads

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity states in its Sustainability Report 2020 that it complies with national and international laws and regulations relevant to the industry, and broader regulations on preventing corruption, breaches of trust, fraud or money laundering.
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 identifies in its Sustainability Report 2020 its main stakeholders and interested parties with their main requirements. It informs that in the last two years two complaints were made regarding noise and odour. Measurements were taken to lower noise and odour levels. Neighbours can contact the plant 24 hours a day by phone or email.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity commenced in 2021 to undertake the Environmental Life Cycle Assessment 2020 on Automotive products in conformance with ISO 14040:2006 and ISO 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Life Cycle Assessments are available for automotive and non-automotive products and can be requested by clients. Information about LCA are also in the Sustainability Report.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Life Cycle Assessments 2019 for automotive and non-automotive products were conducted and reported in compliance with ISO 14040:2006 and ISO 14044:2006.
4.2 Product design	Conformance	The Customer To Design (CTD) tool allows product designers to have a rough estimation of potential Global Warming Potentials for new products in an early stage.
4.3a Aluminium Process Scrap (targets)	Conformance	Process Scrap and recycle targets are in place and the Entity has a plan to develop processes to recover scrap of customers.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Aluminium Process Scrap is separated by Aluminium alloys and grades in bins for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is working together with the European Aluminium Association to promote end-of-life recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is an active member of the European Aluminium Association (EAA) to promote the

CRITERION	RATING	COMMENT
		collection of end-of-life vehicle scrap. Various cooperation with EAA and universities is ongoing.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Greenhouse Gases (GHG) are accounted, tracked and reported as needed from Government EU-ETS Statement. The Sustainability Report 2020 contains information about GHG emissions on page 33: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
5.2 GHG emissions reductions	Conformance	Greenhouse gas emission reductions measures and targets are reported in the Alvance Sustainability Report 2020, page 33: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.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	Relevant air emissions are reported to the government on a yearly basis. The Entity communicates its Scope 1 and 2 GHG emissions of the last years and the activities to reduce them in the Sustainability Report 2020, page 33: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
6.2 Discharges to Water	Conformance	Water is primarily used for cooling as part of the production process. Water discharges are monitored on a monthly basis. To mitigate adverse impacts to the environment and human health from Discharges to Water, the Entity implemented a water treatment process. The environmental program also contains measures to reduce wastewater impact. For further information see the Sustainability Report 2020, page 35:

CRITERION	RATING	COMMENT
		https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Risk analysis is integral to the Environmental Management System and covers emissions to air, land and water for the rolling mill and casthouse. Areas with high risk are identified and plans for reducing risk are implemented.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The emergency plan covers Spills and leakage. A preventive maintenance system is implemented for regular and risk-based checks of systems and equipment for leakage and spills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	A procedure on how to handle and report Spills is in place. Environmental incidents are reported to the applicable governmental department. The one and only spill was recorded and reported to governmental service in 2017.
6.4b Reporting of Spills (regular reporting)	Conformance	Reporting of spills is covered by the implemented ISO 14001:2015 system and part of annual environmental/ sustainability reporting: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
6.5a Waste management and reporting (strategy)	Conformance	Waste management is designed according to the Waste Management Hierarchy. Regular reports to the legal authority are issued annually. The Entity is partnering with its customer to: understand their key business and sustainability drivers to initiate new product development; implement closed-loop manufacturing processes to help them reduce waste and incorporate more recycled content into their products, and; pursue life cycle assessments (LCAs) and environmental certification to quantify the environmental benefits of certain products. Further information is available in the Sustainability Report 2020, page 34: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
6.5b Waste management and reporting (disclosure)	Conformance	Waste management is designed according to the Waste Management Hierarchy. Types and volumes of wastes and type of disposal are reported in the annual report (IMJV) to government. The report contains a waste statistic for Hazardous and Non-Hazardous Waste. Information about waste

CRITERION	RATING	COMMENT
		composition is also included in the Sustainability Report 2020, Page 34: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.
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	For each type of Dross different containers are available for collection in the casthouse. Collected Dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a subcontractor to be recycled.
6.8b Dross (recycling)	Conformance	For each type of Dross different containers are available for collection in the cast house. Collected Dross is sent to a company in Germany for recycling. The resulting salt slag of the recycling process is sent to a subcontractor to be recycled.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	All Dross is recycled, there is no landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity identified and mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	A risk assessment including water-related risks in the Area of Influence is part of the Environmental Management System. No significant material water-related risks were identified.
7.2a Water management (management plans)	Not Applicable	Not applicable as no material water-related risks were identified. However, water management is part of the Environmental Management System.
7.2b Water management (monitoring)	Not Applicable	Not applicable as no material water-related risks were identified. However, monitoring the effectiveness of the plan is planned for the next management review, including ASI requirements.
7.3 Disclosure of water usage and risks	Conformance	Water usage and wastewater are part of the information provided in the annual report (IMJV Water) to government and at the Entity's Sustainability Report 2020, page 35: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Risk assessment and investigation of biodiversity impacts from activities on the Entity's premises and in the Entity's Area of Influence was undertaken by an external party. A detailed Improvement plan was developed. Plant species were mapped and registered. At some locations within the Entity's boundary, non-endemic species were identified. A number of Polygonum plants (alien species) were found and will be removed.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the results of the biodiversity assessment a Biodiversity Action Plan for the years 2018 to 2023 was prepared. The biodiversity study/assessment and biodiversity plan were presented to the public and internal stakeholders at the beginning of 2019.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan is part of the Biodiversity Assessment Report and includes time-bound targets to address material impacts identified

CRITERION	RATING	COMMENT
		in the risk assessment. The Action Plan was developed via a consultative approach and designed in accordance with the Biodiversity Mitigation Hierarchy by an external specialist.
8.2c Biodiversity management (reporting)	Conformance	The biodiversity study and Biodiversity Action Plan were presented to the public and internal stakeholders in January 2019. Outcomes of biodiversity study are included in the Sustainability Report.
8.3 Alien Species	Conformance	The initial biodiversity study identified the presence of Alien Species. The Entity implemented an Action Plan to eliminate Alien Species and to prevent reintroduction of the plant species in the future.
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 communicates in its Sustainability Report the commitment to support the protection of the internationally proclaimed Human Rights and expects its suppliers to do so.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity requests its suppliers to comply with its Code of Conduct. It introduced processes to comply with the conflict mineral disclosure obligations. The Entity conducted a supplier survey to identify potential risks and negative impact of its suppliers on Human Rights. The Entity has identified and addresses the topics of its main stakeholder groups in the Sustainability Report.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity communicates in its Sustainability Report its commitment to comply with the UN Human Rights principles and it expects, that suppliers do the same. The Entity conducted a supplier survey to identify potential risks and negative impact of its suppliers on Human Rights.

CRITERION	RATING	COMMENT
		The Entity has identified and addresses the topics of its main stakeholder groups in the Sustainability Report.
9.2 Women's Rights	Conformance	The Entity commits in its Code of Conduct to not tolerate any form of Discrimination and to respect gender diversity. Gender diversity is also reported in the published Sustainability Report.
9.3 Indigenous Peoples	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium and there is no cultural and sacred heritage affected.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium. No Resettlements have taken place and no residents are affected by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable, as there are no Indigenous Peoples in Belgium. No Resettlements have taken place and no residents are affected by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity is in close contact with its neighbours and periodic consultations take place. Stakeholders with their interests were identified and mapped in the Sustainability Report. All rights of the neighbours are covered by Belgian law.
9.7b Local Communities (impacts)	Conformance	The Entity identifies its neighbours as important stakeholders and installed a Project Leader in 2020 to engage with the local Community. Neighbours can reach the Entity 24 hours a day via telephone +32 15 30 22 22 or via info.duffel@alvancegroup.com . Details are available in the Sustainability Report, page 24: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity identified its neighbours as important stakeholders and mapped their interests in the Sustainability Report. It is in close contact with its neighbours, periodic consultations take place to identify and solve any negative impact on the livelihoods of the neighbours.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	There are no activities in Conflict-Affected and High-Risk Areas. The Entity's Policies and Code of Conduct prohibit activities in conflict zones.
9.9 Security practice	Not Applicable	Plant security is provided through the Entity's own staff, who are trained accordingly and are required to pass an exam. A code of conduct for security personnel exists.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The rights of Workers representation are regulated by Belgian law. Several trade unions are present at the Entity and they are included in the representation of the Workers' rights (e.g. Workers council, Health and Safety Committee). The Entity communicates its commitment to the Freedom of Association in the Sustainability Report and expects the same from its suppliers, see page 21 and 38: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity communicates its commitment to Collective Bargaining in the Sustainability Report and expects the same from its suppliers. Collective Bargaining Agreements exist on national, sectoral and company level.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Not applicable, as Freedom of Association and Collective Bargaining are guaranteed by Belgian law.
10.2a Child Labour (minimum age)	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. The Entity only employs Workers over 18 years old.
10.2b Child Labour (hazardous)	Conformance	Child Labour is prohibited in Belgium and the minimum working age is 15 years. Workers under 18 are prevented from carrying out hazardous work by Belgian law. The Entity only employs Workers over 18 years old.
10.2c Child Labour (worst forms)	Conformance	Child Labour is prohibited in Belgium. The Entity only employs Workers over 18 years and requires from its suppliers to fight Forced Labour, modern slavery and Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	Forced Labour is prohibited in Belgium. The Entity commits its position in the sustainability report and in the supplier code of conduct. It requires from its

CRITERION	RATING	COMMENT
		suppliers to fight Forced Labour and modern slavery.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Forced Labour is prohibited in Belgium. The Entity does not require any deposits, fees or advances from its employees. It requires from its suppliers to fight Forced Labour and modern slavery.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require any deposits, fees or advances from its employees. It requires from its suppliers to fight Forced Labour and modern slavery.
10.3d Forced Labour (debt bondage)	Conformance	Forced Labour is prohibited in Belgium. The Entity does not hold workers in Debt Bondage. It requires from its suppliers to Forced Labour and modern slavery.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in Forced Labour. There is no restriction in the freedom of movement at the site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour. The Entity does not hold original documents only copies of identity papers and passports in the Workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is not involved in Forced Labour. The time for announced termination of the working contract is regulated by Belgian law.
10.4 Non-Discrimination	Conformance	Discrimination is prohibited by Belgian law. The Entity states in its Sustainability Report and in its Code of Conduct, that Discrimination is neither tolerated at the site nor at the suppliers: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf
10.5 Communication and engagement	Conformance	The Entity has direct communication channels between management and Workers and their representatives. Workers can contact their representatives or four nominated trust persons to discuss issues on their behalf. A hotline for reporting any issues exists is communicated internally and externally. Further information is available in the Sustainability Report, page 21, 24 and 38: https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	Coercion and harassment are forbidden under Belgian law. Permitted Disciplinary procedures are documented in the work rules. Implementation of these procedures was verified during the interviews with the workers, the independent worker representatives and the human resources managers.
10.7a Remuneration (living wage)	Conformance	Wages are regulated through the Collective Bargaining Agreement of the sector. The Entity provides additional financial and non-financial benefits for the employees. The Entity requires from its suppliers to pay minimum wages in accordance with local law and to ensure the compensation of living wages according to the local living conditions.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted on a monthly basis to the employees' bank accounts.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid with the relevant bonus payments. Working schedules are part of the Entity's work rules.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a Policy on Environment, Health and Safety, that is available at different places in the plant and on the website: https://alvancealuminiumduffel.be/app/uploads/2021/07/2021-ALVANCE-Aluminium-Duffel-BV-Policy-on-EHS-final-FV41.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has a Policy on Environment, Health and Safety, that is available at different places in the plant and on the website: https://alvancealuminiumduffel.be/app/uploads/2021/07/2021-ALVANCE-Aluminium-Duffel-BV-Policy-on-EHS-final-FV41.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has a Policy on Environment, Health and Safety. It contains the commitment to comply with all applicable Environmental, Health and Safety laws. It is communicated internally and can be downloaded from the website: https://alvancealuminiumduffel.be/app/uploads/2021/07/2021-ALVANCE-Aluminium-Duffel-BV-Policy-on-EHS-final-FV41.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity communicates in its EHS Policy, that employees will not perform any work action or task that they consider unsafe:

CRITERION	RATING	COMMENT
		https://alvancealuminiumduffel.be/app/uploads/2021/07/2021-ALVANCE-Aluminium-Duffel-BV-Policy-on-EHS-final-FV41.pdf
11.2 OH&S Management System	Conformance	<p>The Entity is certified against ISO 45001 and the Environment, Health and Safety Policy can be downloaded from the website:</p> <p>https://alvancealuminiumduffel.be/app/uploads/2021/07/2021-ALVANCE-Aluminium-Duffel-BV-Policy-on-EHS-final-FV41.pdf</p> <p>Health and Safety is reported on in the Sustainability Report 2020, from page 16:</p> <p>https://alvancealuminiumduffel.be/app/uploads/2021/12/2020-Sustainability-Report-ALVANCE-Aluminium-Duffel.pdf</p>
11.3 Employee engagement on health and safety	Conformance	<p>Monthly Safety Committee meetings are held to review incidents and observations. The Safety Committee consists of representatives of blue collar, white collar, Human Resource Department and the Union.</p>
11.4 OH&S performance	Conformance	<p>The Entity is comparing performance against other Alvance facilities by leading and lagging indicators. Departments get feedback on actual indicators every month.</p>

Document Control and Version History

Revision	Date	Notes
0	3 August 2020	Initial Certification Audit – Full Certification
1	18 August 2021	Transfer of Certification to Alvance Aluminium Duffel BV from Novelis Duffel (formerly Aleris Duffel) – Provisional Certification Next Audit Type and Next Audit Date revised to Surveillance Audit (29 December 2021)
2	11 March 2022	Surveillance audit – Full Certification