

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# AS Oxidwerke GmbH

CERTIFICATE  
NUMBER

252

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE  
1 MARCH 2023

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

DATE OF EXPIRY  
28 FEBRUARY 2026

ASI ACCREDITED  
AUDITING FIRM  
GUTCERT (AFNOR  
GROUP)

CERTIFIED SINCE  
1 MARCH 2023

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

AS Oxidwerke GmbH, Nenzinger Str.  
17, 78333 Stockach, Germany,  
recycling of aluminium salt slags  
from different customers and of  
different composition into its  
aluminium components, salt and  
oxides. All products are reusable  
and sold on the market.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	AS Oxidwerke GmbH
ENTITY NAME	AS Oxidwerke GmbH
CERTIFICATION SCOPE	AS Oxidwerke GmbH, Nenzinger Str. 17, 78333 Stockach, Germany, recycling of aluminium salt slags from different customers and of different composition into its aluminium components, salt and oxides. All products are reusable and sold on the market.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Other manufacturing or sale of products containing Aluminium</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>11 November – 11 December 2022</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 January 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers AS Oxidwerke GmbH, Nenzinger Str. 17, 78333 Stockach, Germany, recycling of aluminium salt slags from different customers and of different composition into its aluminium components, salt and oxides. All products are reusable and sold on the market.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Other manufacturing or sale of products containing Aluminium</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>

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CERTIFICATION PERIOD 1 March 2023 - 28 February 2026

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NEXT AUDIT TYPE Surveillance Audit

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NEXT AUDIT DATE 1 September 2024

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CERTIFICATE NUMBER 252

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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

AS Oxidwerke GmbH (ASO) is a salt slag recycling facility based in Stockach located about 5 km northwest of Lake Constance in southern Baden-Württemberg, Germany. The town of Stockach has around 17,000 inhabitants and is part of the Konstanz district. Stockach is one of the few Lake Constance municipalities to have a purely industrial area. The "Hardt" industrial area, more than 5 hectares of space are available for industrial and commercial settlement.

In ASO's recycling process salt slag is fully recycled into its components aluminium, salt and aluminium oxides which are subsequently sold as products on the respective markets. The salt slag is produced when secondary aluminium is melted with under salt. It is completely recycled in the slag and water treatment plant. The site has a processing capacity of around 50,000 tonnes of salt slag per year. Annually, ca. 25,000 tonnes of salt, more than 3,500 tonnes of aluminium granulate and approx. 20,000 tonnes of aluminium oxide are returned to the material cycles. The Entity 2021 sales are approximately 10 million EUR and employ approximately 18 personnel.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	High	Medium	Medium	Medium
<b>RISKS</b>	High	Medium	Medium	Medium
<b>PERFORMANCE</b>	High	High	Medium	High
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented processes (including a legal register) that allow adequate awareness of legal requirements and ensures compliance with Applicable Laws and regulations. Legal developments are systematically monitored, and competent legal advice is available.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. The Entity has a system in place against Corruption that is adequate for the size and nature of its business.</p> <p>A Code of Conduct covering business ethics has been issued and communicated internally and externally. The company's Code of Conduct is available in the local language at: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a></p> <p>The Entity has provided training to employees on business ethics.</p> <p>An external tax Auditor periodically audits the financial system.</p>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct and a Supplier Code of Conduct including principles relevant to environmental, social and governance (ESG) performance. Both documents are available at: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has issued its Environment, Health &amp; Safety Policy. Human and labour rights are addressed in the Code of Conduct. These documents have been adequately communicated internally (intranet, postings) and on the Entity's website (<a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a>).</p> <p>The policy documents are regularly reviewed.</p>
2.2a-c Leadership	Conformance	One of the two Managing Directors and the Plant Manager jointly take overall responsibility and authority for ensuring conformance with the ASI Performance Standard. Adequate resources are provided.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established, implemented and maintains its Environmental Management System as part of its integrated Management System. Responsibilities are assigned, objectives are defined, and performance is regularly reported.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has defined its Social Management System in an adequate process description, which is adequate to the size and nature of the business.
2.4a-e Responsible Sourcing	Conformance	The Entity has issued and communicated its Supplier Code of Conduct, covering environmental, social and governance issues, Suppliers are requested to sign it, available at: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a> (German).

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable, as there are no New Projects or Major Changes since the Entity joined ASI.</p> <p>However, the Entity has developed and implemented a process to ensure that Environmental and Social Impact Assessments for New Projects or Major Changes to the existing facility will be conducted, if such a situation should occur in future.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable, as there are no New Projects or Major Changes since the Entity joined ASI.</p> <p>However, the Entity has developed and implemented a process to ensure that Human Rights Impact Assessments for New Projects or Major Changes to the existing facility will be conducted.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has site-specific emergency response plans in place. They were developed in collaboration with relevant Stakeholders (e.g., fire brigade) and are communicated internally. The plans comprise preventive and corrective measures. Due to the type and nature of the business, emergencies that affect neighbours or the environment are handled by the public fire brigade. The Entity describes on its website, how it acts in the event of an emergency, see <a href="https://www.as-oxid.de">https://www.as-oxid.de</a>.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity periodically evaluates risks that are related to factors outside its control and prepares for those that they have evaluated as relevant. The Entity has established plans to address situations where it may have to suspend or significantly alter operations.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Criterion is not applicable, as there are no known plans for a merger or acquisition.</p> <p>However, the Entity has defined responsibilities and set rules to ensure that in the event of a merger or acquisition, all legal and ASI requirements will be met.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Criterion is not applicable, as there are no known plans for closure, decommissioning or divestment of the Entity.</p> <p>However, the Entity has defined responsibilities and set rules to ensure that in the event of closure, decommissioning or divestment, all legal and ASI requirements will be met.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its first annual Sustainability Report on its website: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has published a 'Non-Compliance &amp; Liabilities' statement on their website: <a href="https://www.as-oxid.de">https://www.as-oxid.de</a></p> <p>The Managing Director confirms that there have been no court judgments, penalties, sanctions or fines against the Entity in the past three years and that no proceedings are pending.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has developed and implemented Systems and Processes (e.g., Code of Conduct, training, risk assessments and periodic financial audits) that conform to anti-Corruption requirements related to payments to governments and the facilitation of payments.</p>

CRITERION	RATING	COMMENT
		A statement regarding payments to Governments is available in the 2022 Sustainability Report, (2021 data), page 28: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	All Stakeholders and rightsholders can direct requests or concerns via mail, email or phone. Information on the grievance mechanism is publicly available at: <a href="https://www.as-oxid.de/kontakt-agb/">https://www.as-oxid.de/kontakt-agb/</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA), which is available at: <a href="https://www.as-oxid.de/app/download/9927573469/LCA+AS+Oxidwerke+2021.pdf?t=1666186178">https://www.as-oxid.de/app/download/9927573469/LCA+AS+Oxidwerke+2021.pdf?t=1666186178</a>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's LCA is publicly available including details on the assumptions and explanations: <a href="https://www.as-oxid.de/app/download/9927573469/LCA+AS+Oxidwerke+2021.pdf?t=1666186178">https://www.as-oxid.de/app/download/9927573469/LCA+AS+Oxidwerke+2021.pdf?t=1666186178</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, due to the nature of the business (salt slag recycling) there are no design activities.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity, due to the nature of the business (salt slag recycling) there is no Aluminium Process Scrap generated.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable, due to the nature of the business (salt slag recycling), the Entity's business model is recycling. However, the Entity works closely with companies that generate Salt Slag to maximise the recovery of salt, Aluminium and aluminium oxide.
4.4d Collection and Recycling of Products at End of Life	Not Applicable	This Criterion is not applicable to the Entity, as due to the nature of the business (salt slag recycling), the Entity's business model is recycling. However, the Entity has established a closed loop with their sister company Stockach Aluminium by receiving all their Salt Slag and supplying salt and metallic aluminium.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has publicly disclosed its GHG emissions and its energy use where emissions from Scopes 1 and 2 are considered, see the Sustainability Report 2022, page 21: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf</a>  The Entity has implemented a certified Energy Management System according to ISO 50001. The Entity has demonstrated the GHG emissions data have been independently verified during ISO 50001 audits.
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Started production after 2020		
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has defined its emission reduction plan jointly with its sister company Stockach Aluminium. The Entity determines its Energy saving targets on an annual basis. At the time of the audit, the targets for 2022 have almost been achieved. However, it was identified that the Entity has not been able to demonstrate that it is ensuring a GHG emissions reduction pathway consistent with a 1.5°C warming scenario and that it includes an intermediate target covering a period no greater than five years.
5.4 GHG Emissions Management	Conformance	The Entity has implemented an Energy Management System and a process and controls to achieve performance aligned with the GHG Emissions Reduction Plan and targets jointly developed with its sister company Stockach Aluminium.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has publicly disclosed its material Emissions to Air from its activities in its Sustainability Report 2022, pages 23-24:  <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a></p> <p>The recent measures taken and planned to minimise Emissions to Air are detailed.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has publicly disclosed its material consumption and discharges of water in its Sustainability Report 2022, page 20:  <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed the risks associated with spills and leakages and has taken preventive action to avoid such incidents and prepared for emergencies. This was confirmed by interviews, a site tour and a document review.</p> <p>Process water is not directly discharged into a river but is used in a circular loop. As there have been no material spills or leakages that have occurred at the Entity's premises, there are no subsequent assessments and actions requiring public disclosure.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has publicly disclosed information about leakages and spills in its Sustainability Report 2022, page 20: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a></p> <p>No environmental accidents, significant leaks or other similar incidents occurred in 2021.</p>



CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has publicly disclosed information on its disposed waste in its Sustainability Report 2022, page 19: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a></p> <p>In the production process, the aluminium Salt Slag is turned into smelting salt and aluminium oxide; the Aluminium contained in the slag is recovered. All three materials are sold as commercial products.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has publicly disclosed its annual water withdrawal and use in its Sustainability Report 2022, page 20: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a></p> <p>The Entity has identified that the risks to watersheds in their Area of Influence were not considered as being Material.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk assessment did not identify Material risks to watersheds.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity implemented an environmental impact assessment that addressed biodiversity issues and concluded that there is no Material negative impact on biodiversity and ecosystem services.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity implemented an environmental impact assessment which concluded that there is no Material negative impact on biodiversity and ecosystem services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks identified in their biodiversity assessment were rated as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the environmental assessment did not identify that the Entity or external stakeholders depend on any Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity works to prevent the accidental or deliberate introduction of Alien Species. A potential risk is the use of wooden pallets. All pallets are sourced locally and shipped to customers neighbouring countries in Europe only.

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has confirmed that it is not operating in, or near a Protected Area or World Heritage Site. More information is available in the Sustainability Report 2022, page 25: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a>
8.6a-d Protected Areas	Conformance	The Entity does not operate in or near a Protected Area. For more information see the Sustainability Report 2022: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf?t=1669630943</a>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity's Code of Conduct includes Human Rights, see page 4: <a href="https://www.as-oxid.de/app/download/9927572869/GDGF3+v4%2C+08-2022%2C+Verhaltenskodex+S-Alu+und+ASO.pdf?t=1666700053">https://www.as-oxid.de/app/download/9927572869/GDGF3+v4%2C+08-2022%2C+Verhaltenskodex+S-Alu+und+ASO.pdf?t=1666700053</a>  The Entity conducted a documented Human Rights Due Diligence assessment. It was concluded in the risk assessment and confirmed by interviewed management representatives that there are currently no salient issues regarding Human Rights.
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has developed and implemented policies, procedures and processes that conform to the Women's Rights requirements. However, it was identified a formal program to promote gender equity and women's empowerment was not in place at the time of the audit.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. The Entity is located in southern Germany.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. The Entity is located in southern Germany.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. The Entity is located in southern Germany.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. The Entity is located in southern Germany.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as it is not located near sacred or cultural heritage sites. There are no Indigenous Peoples present in the area (southern Germany). The industrial site is active for a century.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the vicinity (southern Germany).
9.6a-i Displacement	Not Applicable	Due to the size and nature of the business, this Criterion is not applicable to the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has demonstrated there are no salient issues with Local Communities and therefore no need for action. The site has regular contact with local authorities. The interest and impacts of affected groups have been mapped and described in the Sustainability Report, page 9: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Not Applicable	This Criterion is not applicable to the Entity, as it does not source Bauxite, Alumina or Primary Aluminium.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity, as it does not source Bauxite, Alumina or Primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as it does not source Bauxite, Alumina or Primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity, as it does not source Bauxite, Alumina or Primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable to the Entity, as it does not source Bauxite, Alumina or Primary Aluminium.
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity, as it does not employ or engage any security forces.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to unite freely in the unions, seek representation and join the works council without interference.  A freely elected worker representation (Works Council) is in place. The Entity respects the right of Collective Bargaining. It adheres to the Collective Bargaining Agreement (CBA) negotiated on a site level. However, the Entity is not a member of the employers' collective bargaining community which negotiates at a branch level with the union.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates/is located.

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	<p>The Entity does neither use nor support the use of Child Labour. Minimum working age of 15 years is respected.</p> <p>There are practices in place to ensure that children are not employed. Young workers might be employed for educational purposes only such as for apprenticeships. If at all, work with hazardous substances happens only under supervision and as part of vocational education.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity does neither engage in nor support the use of Forced Labour, neither directly nor through employment or recruitment agencies, as verified through interviews at: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity does not engage in nor support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Employees have received diversity and Anti-Discrimination training. This was verified through interviews and document review.</p>
10.5 Communication and engagement	Conformance	<p>As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation, or harassment.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. This was verified through interviews and document review.</p> <p>The Entity's Code of Conduct addresses fair workplace conditions: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf</a></p> <p>However, it was identified the Code does not fully meet the requirements concerning a workplace policy on violence and harassment.</p>
10.7a-c Remuneration	Conformance	<p>The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and worker interviews.</p> <p>Working Time, payment and leave are negotiated in Collective Bargaining agreements. The wages paid are above the legal minimum. They are in line with the industry standard.</p> <p>Interviewed Workers confirmed that payments are on time, in full and that they understand the details stated on their pay slips.</p>
10.8a-c Working Time	Conformance	<p>The Entity does comply with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is included in each employment contract, and a clocking-in system is in place.</p>

CRITERION	RATING	COMMENT
		Due to the shift system, Overtime is limited. Workers have, at a minimum, an average of two days off per seven-day period and their workday is eight hours on average over six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity has demonstrated that Workers are informed about their rights, which is initially undertaken during the recruitment process and further information is provided by the worker representative and training on the Code of Conduct. This was verified through interviews.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has issued and communicated its Environment, Occupational Health, and Safety Policy. It is available at: <a href="https://www.as-oxid.de/umwelt">https://www.as-oxid.de/umwelt</a></p> <p>The Entity has implemented and maintains a documented system to manage Occupational Health &amp; Safety. However, one deficiency has been identified which relates to the adequacy of the risk assessments concerning psychological factors and mental well-being.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity publishes data on accidents which are available in the Sustainability Report 2022, pages 15 and 18: <a href="https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf">https://www.as-oxid.de/app/download/9927571669/2022+Nachhaltigkeitsstatus+AS+Oxidwerke+GmbH.pdf</a></p> <p>However, the published data only provide two indicators and comparative analyses of performance with peer businesses and leading practices are missing.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented mechanisms, including a health & safety committee, by which Workers can discuss Occupational Health & Safety issues with management.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 March 2023	Initial Certification Audit – Full Certification