
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

GOLDEN ALUMINUM INC.

CERTIFICATE
NUMBER

198

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

28 APRIL 2022

DATE OF EXPIRY

27 APRIL 2025

CERTIFIED SINCE

28 APRIL 2022

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

Recycled Aluminum rolling mill located in Fort
Lupton, Colorado (USA) including proprietary Block
Caster - coil coating operations and associated
processes and procedures.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Golden Aluminum Inc.
ENTITY NAME	Golden Aluminum, Fort Lupton, Colorado Mill.
CERTIFICATION SCOPE	Recycled Aluminum rolling mill located in Fort Lupton, Colorado (USA) including proprietary Block Caster - coil coating operations and associated processes and procedures.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification.
AUDIT DATE	<ul style="list-style-type: none">28 February – 2 March 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">29 March 2022
AUDIT SCOPE	<p>The audit scope covered the Golden Aluminum Fort Lupton Aluminum Mill, Re-melting facility and included a review of the policies, processes, and procedures to address key environmental, social, and governance performance factors.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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

28 April 2022 – 27 April 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

27 April 2023

CERTIFICATE
NUMBER

198

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has a compliance obligations management procedure which identifies three primary areas outlining compliance-related obligations including operational, products and social governance.
1.2 Anti-Corruption	Conformance	The Entity has a Conduct and Performance Improvement Policy which identifies common compliance issues, including Corruption, and to provide clear guidance and resources for employees.
1.3 Code of Conduct	Conformance	The Entity has a Conduct and Performance Improvement Policy which identifies common compliance issues to provide clear guidance and resources for employees. This policy is incorporated into the Employee Handbook and is reviewed as part of the employee onboarding process.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established both a Health and Safety Policy and an Environmental Compliance and Sustainability Policy outlining the overall company commitment to protect the environment, ensure the health and safety of products, employees, and contractors and to operate responsibly in the community.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Leadership responsibilities are outlined in the Entity's management system manuals including the Quality Assurance Manual, ASI Performance Standard Manual and EHS Management System Manual. The Entity has designated the General Manager as the ASI Management Representative, responsible and accountable for ensuring the ASI Management System achieves its intended outcomes.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's EHS Policies are published in the Employee Handbook and displayed at the facility. These are reviewed on a periodic basis, with any changes approved and communicated. The Policies are published on the Entity's webpage.
2.2 Leadership	Conformance	The Entity has designated the General Manager as the ASI Management Representative, responsible and accountable for ensuring the ASI Management System achieves its intended outcomes.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has a Quality Management System (QMS) certified according to ISO 9001. Specific elements of the Environmental Management System and Social Management System have been integrated into the QMS where applicable and include the key requirements required under ISO 14001:2015 and ISO 45001:2018.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has a Quality Management System (QMS) certified according to ISO 9001. Specific elements of the Environmental Management System and Social Management System have been integrated into the QMS where applicable and include the key requirements required under ISO 14001:2015 and ISO 45001:2018.
2.4 Responsible Sourcing	Conformance	The Entity has established a Purchasing Standard Operating Procedure which outlines the requirement for evaluating and selecting suppliers. This evaluation includes the assessment of a suppliers' capability to supply materials, equipment and parts, and supplies used in processing customer products and associated services that may affect product quality, the environment, or the health and safety of employees.
2.5 Impact Assessments	Conformance	The Entity has established a Management of Change Procedure which provides a system and instructions and assigns responsibilities for initiating, processing and controlling changes to the Quality Management System (QMS) and all associated processes and stakeholders.
2.6 Emergency Response Plan	Conformance	The Entity has established an Emergency Response Plan and an associated implementation guide to identify the potential for and response to incidents and emergency situations, to prevent and mitigate the environmental and occupational health and safety impacts, injuries or illnesses, and property damage that may be associated with the emergency.
2.7 Mergers and Acquisitions	Conformance	The Entity is a single site location and is not planning to undertake a merger or acquisition at present. Should such activity occur in the future, the Entity would implement the current Quality Management System and EHS Management System to assure risks and opportunities are identified.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity is a single site location and is not planning to divest or decommission the site at present. Should such activity occur in the future, the Entity would implement the current Quality Management System and EHS Management System to assure risks and opportunities are identified.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has established time-based targets for Greenhouse Gas (GHG) emissions, water usage, landfill waste and green raw material inputs. Targets are monitored and tracked on a monthly basis and included in the Sustainability Scorecard, available on the Entity's website: http://www.goldenaluminum.com/Sustainability
3.2 Non-compliance and liabilities	Conformance	The Entity has not received a non-compliance against Applicable Law or incurred any liabilities specific to environmental, health and safety performance in the last three years.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes payments to governments on a legal and/or contractual basis consistent with the Anti-Corruption Policy, however it does not currently have a contract with government.
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	Customer complaints are recorded in a log maintained by the Customer Service Department. Customer feedback is communicated to the relevant functions within the organization to determine the response and action required. Complaints or concerns from members of the Community or local government agencies made directly to the plant are addressed by the EHS Manager. The Human Resources Department maintains an open-door policy for employees and has defined a grievance process, outlined in the Employee Handbook.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity is an active member of the Aluminum Association (AA) and as a relatively small company, relies on its involvement with AA to monitor industry trends and expertise.

CRITERION	RATING	COMMENT
		<p>The AA published the Environmental Footprint of Semi-Fabricated Aluminum Products in North America in January 2022: https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</p> <p>This Life Cycle Assessment (LCA) report focuses on environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments. A link to the LCA is provided on the Entity's website.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity is an active member of the Aluminum Association (AA) and as a relatively small company, relies on involvement with AA to monitor industry trends expertise.</p> <p>The AA published the Environmental Footprint of Semi-Fabricated Aluminum Products in North America in January 2022: https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</p> <p>This Life Cycle Assessment (LCA) report focuses on environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments. A link to the LCA is provided on the Entity's website.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Aluminum Association (AA) published a Life Cycle Assessment (LCA) report, the Environmental Footprint of Semi-Fabricated Aluminum Products in North America, in January 2022: https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</p> <p>A link to the LCA is provided on the Entity's website.</p>
4.2 Product design	Conformance	<p>The Entity manufactures Aluminium Rigid Container Sheet (RCS) via an energy efficient continuous casting mini-mill process. The RCS is a special series of Aluminium alloys used to make lids, tabs, and can bodies for the beverage and food industries.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>Aluminium Process Scrap is returned to the furnaces and re-melted. The Entity aims to minimize scrap through continuous improvement practices, plant operational targets and preventive maintenance processes.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity is committed to reducing Aluminium Process Scrap generated through their processes. All metal production scrap is returned to the front of the</p>

CRITERION	RATING	COMMENT
		process and remelted. The Entity is actively implementing projects to minimize scrap through continuous improvement practices, plant operational targets and preventive maintenance processes.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity manufactures Aluminium Rigid Container Sheet (RCS) via an energy efficient continuous casting mini-mill process. This process produces a series of aluminum alloys used to make lids, tabs, and can bodies for the beverage and food industries that are 100% recyclable at the end of its life cycle. The Entity uses approximately 50% recycled Aluminium as raw material and provides the network for customers to return scrap. The Entity's sustainability goal is to increase the use of 'green' raw material (metal) by 20% by 2030.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity uses approximately 50% recycled Aluminium as raw material. Efforts to increase this percentage are ongoing in collaboration with customers. The Entity's sustainability goal is to increase the use of 'green' raw material (metal) by 20% by 2030.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses energy use and GHG emissions annually, as required by the US Environmental Protection Agency (EPA) and Colorado Department of Public Health and Environment. The report is submitted online annually, the most recent submitted in March 2021.
5.2 GHG emissions reductions	Conformance	The Entity has established a goal to reduce GHG emissions by 20% (GHG emissions/1000 tons packed) by 2030, and have identified milestone goals for 2023, 2027, and 2028. The goals are published and tracked monthly in the Sustainability Scorecard, available on the Entity's website: http://www.goldenaluminum.com/Sustainability
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		

CRITERION	RATING	COMMENT
6.1 Emissions to Air	Conformance	<p>The Entity's air emissions are tracked and regulated as per the operating permit and reported to the regulatory authorities as required.</p> <p>The Entity monitors and reports on all required pollutant emissions and hazardous air pollutants (HAPs). Emissions calculations are completed monthly using a mass balance approach.</p>
6.2 Discharges to Water	Conformance	<p>Wastewater discharges that require pre-treatment of industrial waste prior to discharge to the local Publicly Owned Treatment Works (POTW) are monitored, tracked and regulated as per the wastewater permit. Any adverse impacts are reported to the regulatory body as outlined in the Slug Discharge Plan.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The site maintains an Emergency Response Plan and associated Guide (ERG) which outlines the requirements for responding to Spills. The Plan outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage. The program includes employee orientation training and more detailed training for employees who have spill response assignments. In addition, the Entity maintains a Spill Response Procedure which is reviewed annually.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity is responsible for compliance with the Emergency Response Plan and associated Guidebook (ERG) and Spill Prevention Control and Countermeasures Plan (SPCC), both of which include requirements for responding to Spills. The response plans outline effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage. The program includes employee orientation training and more detailed training for employees who have spill response assignments. In addition, the Entity maintains a Spill Response Procedure which is reviewed annually.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Spills at the Entity are evaluated to determine if regulatory reporting thresholds are met and an incident investigation is completed to identify immediate corrective actions and to evaluate any environmental impacts. Any significant Spill would be reported according to the local environmental regulations.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Any Spill at the Entity is evaluated to determine if regulatory reporting thresholds are met and an incident investigation is completed to identify immediate corrective actions and to evaluate any</p>

CRITERION	RATING	COMMENT
		<p>environmental impacts. Any significant Spill would be reported according to the local environmental regulations.</p> <p>In addition, the Entity must meet the requirements of Spill Control and Countermeasure (SPCC) regulations. The Entity maintains a current SPCC Plan which outlines procedures and regular inspections to help prevent oil spills as well as provides guidelines for control of a spill should one occur.</p> <p>Specific to wastewater, the Entity has developed a Slug Discharge Plan which also outlines reporting requirements for any potential discharges.</p> <p>Reportable Spills are disclosed on the Entity's website.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity generates waste, including universal, Non-Hazardous and Hazardous Wastes, that are regulated by the applicable environmental protection agencies. The Entity has an Environmental Protection Agency (EPA) Identification Number to track Hazardous Waste. As a facility classified as a 'Large Quantity Generator', the Entity submits a biannual waste report to the applicable regulatory agencies.</p> <p>The amount of waste and recyclable material generated is monitored monthly and reported annually. The Entity has established a waste reduction goal of zero Hazardous Waste generated by 2030. The status of current sustainability projects and activities are reviewed during the Extended Leadership Team (ELT) meetings.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity generates waste, including universal, Non-Hazardous and Hazardous Wastes, that are regulated by the applicable environmental protection agencies. The Entity has an Environmental Protection Agency (EPA) Identification Number to track Hazardous Waste. As a facility classified as a 'Large Quantity Generator', the Entity submits a biannual waste report to the Colorado Department of Public Health and Environment and the US Environmental Protection Agency (EPA).</p>
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.

CRITERION	RATING	COMMENT
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	The Entity currently collects Dross in dross pots that are sent to a third party processor. The separated Aluminium is returned to the Entity and re-introduced into the furnace.
6.8b Dross (recycling)	Conformance	The Entity currently collects Dross in dross pots that are sent to a third party processor. The separated Aluminium is returned to the Entity and re-introduced into the furnace.
6.8c Dross (review of alternatives)	Conformance	The Entity currently collects Dross in dross pots that are sent to a third party processor. The separated Aluminium is returned to the Entity and re-introduced into the furnace.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity established a water balance in June 2021 and monitors water usage on a monthly basis by reading water withdrawal meters and tracking water utility bills.
7.1b Water assessment (risk assessment)	Conformance	The Entity uses water provided by the local municipality in the manufacturing processes. Water is primarily used for cooling during the manufacture of rolled Aluminium coils, resulting in wastewater that is subsequently treated at the on-site wastewater facility. The Entity established a water balance in June 2021

CRITERION	RATING	COMMENT
		and monitors water usage on a monthly basis by reading water withdrawal meters and tracking water utility bills. Water usage is tracked as part of the Sustainability Scorecard and a 2030 reduction goal has been established. This information is published on the Entity's website.
7.2a Water management (management plans)	Conformance	The Entity has invested in wastewater treatment technologies and has partnered with a consultant to evaluate advanced treatment options for various process effluents to identify opportunities to enable water reuse.
7.2b Water management (monitoring)	Conformance	The Entity established a water balance in June 2021 and monitors water usage on a monthly basis by reading water withdrawal meters and tracking water utility bills. Water usage is being tracked as part of the Sustainability Scorecard and a 2030 reduction goal has been established.
7.3 Disclosure of water usage and risks	Conformance	Water usage is tracked as part of the Sustainability Scorecard and a 2030 reduction goal has been established, please refer: http://www.goldenaluminum.com/Sustainability Water discharges are reported to the local municipality, the Colorado Department of Public Health and Environment and to the Environmental Protection Agency (EPA), as required by the wastewater permit.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity completed an internal Biodiversity Checklist in November 2021. This checklist will be reviewed and completed on a biannual basis to identify any known issues on the surrounding Biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity completed an internal Biodiversity Checklist in November 2021 and did not identify any material biodiversity risks. However, two opportunities for improvement were identified and corresponding actions are scheduled for completion.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity completed an internal Biodiversity Checklist in November 2021 and did not identify any material biodiversity risks. However, two opportunities for improvement were identified and corresponding actions are scheduled for completion.
8.2c Biodiversity management (reporting)	Conformance	The Entity completed an internal Biodiversity Checklist in November 2021 and did not identify any material

CRITERION	RATING	COMMENT
		biodiversity risks. However, two opportunities for improvement were identified and corresponding actions are scheduled for completion. The checklist and actions are presented on the Entity's webpage: http://www.goldenaluminum.com/Sustainability
8.3 Alien Species	Conformance	The Entity does not have any Alien Species present nor is there potential for their introduction.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	As outlined in the Human Rights and Labor Policy and Employee Handbook, the Entity is committed to ensuring people are treated with dignity and respect. The Policy provides a framework for decisions, actions and behaviours.
9.1b Human Rights Due Diligence (process)	Conformance	As outlined in the Human Rights and Labor Policy and Employee Handbook, the Entity is committed to ensuring that people are treated with dignity and respect. The Entity complies with applicable national and local legal requirements specific to Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	As outlined in the Human Rights and Labor Policy and Employee Handbook, the Entity is committed to ensuring that people are treated with dignity and respect. There have been no incidents that have impacted Human Rights.
9.2 Women's Rights	Conformance	The Entity rewards all employees equitably based on their competitive labor market data, performance levels and contribution to the Entity's success while ensuring adherence to all Applicable Laws and regulations. The Entity has developed women in leadership roles and actively recruits women for open positions.

CRITERION	RATING	COMMENT
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity does not impact Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity does not impact Indigenous Peoples.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as the Entity is not located on or near a cultural or sacred heritage site.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity is actively engaged in the Local Community and is a member of the Fort Lupton Chamber of Commerce. The Entity provides site tours and participates in community events (outlined in the Community Outreach Calendar).
9.7b Local Communities (impacts)	Conformance	The Entity has evaluated key stakeholders in the surrounding area with potential to be impacted by the Entity. These impacts are also considered during the permitting process.
9.7c Local Communities (livelihoods)	Conformance	The Entity is actively engaged in the Local Community and are members of the Fort Lupton Chamber of Commerce. The Entity provides site tours and participates in community events (outlined in the Community Events Calendar).
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	The Entity does not operate in a Conflict-Affected or High-Risk Area, nor source materials from such an area.
9.9 Security practice	Not Applicable	The Entity does not currently utilize external security agencies.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity does not have a Collective Bargaining agreement in place and the site is non-union. The Entity respects the Workers' Freedom of Association rights.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity does not have a Collective Bargaining agreement in place and the site is non-union. The Entity respects the Workers Collective Bargaining rights.

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity does not have a Collective Bargaining agreement in place and the site is non-union. The Entity respects the Workers Freedom of Association and Collective Bargaining rights.
10.2a Child Labour (minimum age)	Conformance	The Entity adheres to all regulations related to Child Labour laws and forced or compulsory labour, and does not employ individuals under the age of 18.
10.2b Child Labour (hazardous)	Conformance	The Entity adheres to all regulations related to Child Labour laws and forced or compulsory labour, and does not employ individuals under the age of 18.
10.2c Child Labour (worst forms)	Conformance	The Entity adheres to all regulations related to Child Labour laws and forced or compulsory labour, and does not employ individuals under the age of 18.
10.3a Forced Labour (human trafficking)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3c Forced Labour (migrant workers)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity is an 'At Will' employer and does not engage in Forced Labour under any conditions. The Entity's labour policies are defined and communicated in the Employee Handbook.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	The Entity does not tolerate harassment, Discrimination or retaliation in the workplace based on factors such as race, ethnicity, ancestry, color, creed, religion, sex, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability (physical/mental), medical condition, genetic information, veteran status, military status, or any other characteristic protected by applicable federal, state, or local law.
10.5 Communication and engagement	Conformance	The Entity has open communication with employees and has implemented processes to gain feedback. Employees can communicate with their supervisor directly or discuss any concerns or issues with the Human Resources Department.
10.6 Disciplinary practices	Conformance	Disciplinary action ranges from an informal discussion with the employee up to immediate dismissal. Each case is considered individually and on its own merits considering the totality of the circumstances. The disciplinary process is outlined in the Employee Handbook.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to earn a living wage and ensures that wages paid for a normal working week always meet at least legal or industry minimum standards.
10.7b Remuneration (method of payment)	Conformance	The Entity pays employees on a bi-weekly payroll cycle every other Friday. Remuneration information is available to all employees electronically.
10.8 Working Time	Conformance	The Entity is committed to conducting business in a manner consistent with applicable employment and human rights laws and regulations and provides reasonable working hours and fair wages in compliance with local laws.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established a Health and Safety Policy affirming that the health and wellbeing of Employees, Visitors and Contractors is the first priority and is essential to the company's success and for the community.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Health and Safety Policy addresses Employees, Contractors and Visitors and is available on the Entity's website. Contractors and Visitors receive a safety orientation prior to being allowed in the production area.

CRITERION	RATING	COMMENT
1.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Health and Safety Policy includes a statement specific to compliance and the Entity also maintains a Legal Registry that lists all applicable Health and Safety Regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right to stop work is included in the Employee Handbook. All Employees have a personal responsibility to ensure their safety and the safety of those around them and Employees have the right to stop work if working conditions or behaviours are thought to be unsafe.
11.2 OH&S Management System	Minor Non-Conformance	The Entity maintains key components of an Occupational Health and Safety Management System (OHSMS) aligned with the requirements in ISO 45001:2018. The OHSMS is outlined in the EHS Management System Manual and includes the Entity's policies, procedures, and work instructions. However, a number of safety deficiencies were noted during the site walkthrough, including an instance of the Lockout Procedure not being performed prior to electrical maintenance work; a job hazard analysis for a non-routine maintenance activity not completed; a forklift with an inappropriate shield; an inadequate wash station facility; and not all emergency response scenarios had been reviewed or undertaken.
11.3 Employee engagement on health and safety	Conformance	The Entity has established processes outlined in the Employee Environmental, Health and Safety (EHS) Consultation Procedure to assure employees are able to participate and provide input specific to any health or safety concerns. The Entity has established employee lead safety teams referred to as Necessary Effective Safety Teams (NEST).
11.4 OH&S performance	Conformance	The Entity monitors and measures OH&S performance with both leading and lagging indicators including but not limited to incident rates, near miss reporting, training and compliance calendar task completion. This is completed through the EHS reporting system - EHS Velocity.

Document Control and Version History

Revision	Date	Notes
0	28 April 2022	Initial Certification Audit – Full Certification