

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HAMMERER ALUMINIUM INDUSTRIES EXTRUSION GMBH

CERTIFICATE
NUMBER

202

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

4 MAY 2022

DATE OF EXPIRY

3 MAY 2025

CERTIFIED SINCE

4 MAY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a white 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 extruded Aluminium profiles,
Aluminium profiles fabricated and surface-treated,
components made of Aluminium fabricated/welded
and Aluminium Composite profiles, thermally
insulated, at Ranshofen (Austria).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion GmbH
CERTIFICATION SCOPE	Production of extruded Aluminium profiles, Aluminium profiles fabricated and surface-treated, components made of Aluminium fabricated/welded and Aluminium Composite profiles, thermally insulated, at Ranshofen (Austria).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	12 – 25 February 2022
AUDIT REPORT SUBMISSION	13 April 2022
AUDIT SCOPE	<p>The audit scope covers the production of extruded Aluminium profiles, Aluminium profiles fabricated and surface-treated, components made of Aluminium fabricated/welded, Aluminium Composite profiles, thermally insulated.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>The audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included an on-site audit (12 - 14 January 2022) and a remote audit (24 - 25 February 2022).</p>
AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ 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.
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CERTIFICATION PERIOD 4 May 2022 – 3 May 2025

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 3 May 2025

CERTIFICATE NUMBER 202

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. There are systems in place (e.g. a legal database) to maintain awareness of, and to ensure compliance with Applicable Law. The Entity holds valid ISO 14001 and ISO 45001 certifications from an accredited certification body. The HAI Group supports the site with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. The Entity has published and communicated a Code of Conduct for Employees, where it is clearly stated that the Entity in no way tolerates Corruption, antitrust violations, bribes, money laundering, unfair advantages or prohibited agreements, please refer: https://www.hai-aluminium.com/downloads Furthermore, an Anti-Corruption Policy has been issued, communicated and employees receive periodic training. The policy is publicly available on the website and in the HAI Sustainability Report.
1.3 Code of Conduct	Conformance	The Entity has published and communicated a Code of Conduct for Suppliers and the HAI Group's position regarding business integrity is clearly stated, please refer: https://www.hai-aluminium.com/downloads Internally, the Entity has issued, communicated and provided training for the Anti-Corruption Policy.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. The Policies are the subject of periodic employee training. The Entity holds certificates according to ISO 14001 and ISO 45001 from an accredited certification body which is current for the Entity's Certification Scope.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Chief Operating Officer has overall responsibility and authority for ensuring conformance with the ASI Performance Standard. The Entity's EHS Policy and Code of Conduct for Employees are endorsed by both Managing Directors and are periodically reviewed as required by ISO 14001 and ISO 45001.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the Policies internally and externally as appropriate (company website, intranet, training sessions). The Code of Conduct for Suppliers is actively communicated to suppliers. Interviews with Workers and management confirmed that the communication is effective.</p> <p>The EHS Policy is publicly available and is accessible via the following link: https://www.hai-aluminium.com/en/download-center</p>
2.2 Leadership	Conformance	<p>The Entity's Chief Operating Officer has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the Standard. The role is supported by the Quality Manager and the HAI Group. Responsibilities are reflected in organizational charts.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015. The system is certified by an accredited certification body and the certificate is accessible via the following link: https://www.hai-aluminium.com/en/download-center</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented an accredited Occupational Health and Safety Management System according to ISO 45001. The facets of Human and Labour Rights are also managed, but the practice is not yet formalized to the same extent as the Environment, Health and Safety (EHS) system.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has issued its sourcing policy in the Code of Conduct for Suppliers, accessible via the following link: https://www.hai-aluminium.com/downloads</p>
2.5 Impact Assessments	Conformance	<p>The site is situated in an established industrial site (>70 years) and no major projects are planned. Major projects or major changes to existing facilities have not taken place since the Entity joined ASI.</p> <p>The Entity is located in a highly regulated country (Austria) where relevant projects and changes (linked to construction activities) undergo a thorough analysis and authorization process and the Entity has systems in place to manage this effectively. The Entity has specified in a procedure that Impact Assessments will be conducted as necessary.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed a site-specific Emergency Response Plan, prepared in collaboration with relevant stakeholders such as relevant authorities</p>

CRITERION	RATING	COMMENT
		and industrial neighbours. The Entity also holds ISO 14001 and ISO 45011 certifications which are current to the Entity's Certification Scope under the ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	The Entity has not undergone nor planned a merger or acquisition (M&A) since becoming an ASI Member. However, a process has been defined to manage M&As, should it become relevant.
2.8 Closure, Decommissioning and Divestment	Conformance	A procedure for closure, decommissioning and divestment is established in accordance with the requirement of ASI Performance Standard, but no such case has happened since 2010.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social and economic impacts in its Sustainability Report 2020, based on GRI G4 Guidelines: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
3.2 Non-compliance and liabilities	Conformance	Information about significant fines, judgments, penalties and non-monetary sanctions is included in the Sustainability Report 2020, page 14: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
3.3a Payments to governments (legal and contractual)	Conformance	As confirmed by the report of the financial audit 2020 and via interviews, there was no indication observed for undue payments to the 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	The Entity has established accessible Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established: ethics@hai-aluminium.com As of February 2022, a new communication channel will be accessible for all stakeholders: https://www.hai-aluminium.com/compliance-line Employees can also direct their concerns to the Worker representatives. Due to the size and nature of the business, stakeholders can also easily reach top management directly.
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated its life cycle impacts of its major products in a Life cycle Assessment (LCA), developed in accordance with ISO 14040 and ISO 14044. The study was completed by a specialized external institute. The study has not been made publicly available. The Entity provides LCA Information on request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Document review and interviews confirmed that the Entity does provide adequate cradle-to-gate Life Cycle Assessment (LCA) information to customers on request.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	This Criterion is currently not applicable, as the Entity does not publicly communicate on the Life Cycle Assessment (LCA).
4.2 Product design	Not Applicable	This Criterion is not applicable as the Entity has no design responsibility, all design specifications are provided by customers.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented systems and a robust program to recycle 100% of its Aluminium Process Scrap. The Aluminium Process Scrap is recycled at the Entity's sister plant (HAI GmbH), located in the same industrial zone.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium. The effectiveness of these processes were observed during the site tour.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity's recycling strategy is driven by HAI's remelting/casting plant in Ranshofen, Austria which is collecting the Aluminium scrap (including end-of-life products) for its own melting and casting production. The HAI Group works with national and international scrap dealers to secure material for the remelting/casting plant.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products. The HAI Group works with national and international scrap dealers to secure material for the remelting/casting plant in Ranshofen, Austria.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Greenhouse Gas emissions and energy use are reported in the Sustainability Report 2020, page 25:

CRITERION	RATING	COMMENT
		https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
5.2 GHG emissions reductions	Conformance	The Entity has published GHG emissions reduction targets in the Sustainability Report 2020 and implemented an effective plan to achieve these targets, please refer to page 22: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.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	Air emission data is collected and CO ₂ -eq is reported in the annual Sustainability Report 2020, page 25: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
6.2 Discharges to Water	Conformance	The Entity does not directly discharge effluent into waters (e.g. creeks or rivers). Instead, effluent is treated in a neighbouring industrial waste water treatment plant in accordance with the Austrian Indirect Discharger Ordinance. The Entity reports its Discharges to Water in the Sustainability Report 2020, page 24: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Within the scope of its ISO 14001 certified Environmental Management System, the Entity periodically identifies and evaluates major risk areas of operations where Spills and Leakage may contaminate air, water or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As part of its Environmental Management System, the Entity has established management and communication plans, compliance controls and a monitoring programme to prevent and detect Spills and Leakage. One important element implemented is the preventive/predictive maintenance of the technical equipment.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented a procedure to disclose to affected parties the volume, type and potential impact of significant Spills immediately following an incident. Please refer to the Sustainability Report 2020, page 22: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
6.4b Reporting of Spills (regular reporting)	Conformance	As reported in the Sustainability Report 2020, page 22, there was no significant release of substances in the reporting year: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
6.5a Waste management and reporting (strategy)	Conformance	In accordance with its ISO 14001 certified Environmental Management System, the Entity has documented and implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclosed the quantity of their generated waste in the Sustainability Report 2020, page 23: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf Note: The Entity has combined both material and thermal recycling under the term "recovery". They intended to provide these data separately in the next Sustainability Report.
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.

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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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a system in place to identify and map its water withdrawal and use by source and type. Water is supplied by and discharged to an industrial neighbour company.
7.1b Water assessment (risk assessment)	Conformance	The Entity's water requirement is fully supplied by its industrial neighbour, an ASI Performance Standard Certified Entity. As such, water-related risks have been assessed by the industrial neighbour.
7.2a Water management (management plans)	Not Applicable	The Entity did not develop its own water management plan, as water is supplied by its industrial neighbour, an ASI Performance Standard Certified Entity (which identified the risk as low).
7.2b Water management (monitoring)	Not Applicable	The Entity did not develop its own water management plan, as water is supplied by its large industrial neighbour, an ASI Performance Standard Certified Entity (which identified the risk as low).
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water consumption in the HAI Sustainability Report 2020, page 24: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has systematically assessed the risks and materiality of the impacts on Biodiversity from the

CRITERION	RATING	COMMENT
		land use and activities in the Entity's Area of Influence. A documented Biodiversity assessment report is available.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Biodiversity assessment concluded that "relevant risks and immediate mitigation actions regarding the Biodiversity on and around the site could not be identified". However, the Entity is investigating possibilities to improve Biodiversity and has developed a plan accordingly.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion does not apply as the Biodiversity assessment concluded that relevant risks could not be identified.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion does not apply as the Biodiversity assessment concluded that relevant risks could not be identified. However, the Entity has developed a Biodiversity action plan.
8.3 Alien Species	Conformance	The Entity has assessed (as part of the biodiversity assessment) the situation regarding alien species. A relevant risk are the wooden pallets, which are all are treated according the international standards for phytosanitary measures No. 15 (ISPM-15).
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	The Entity has issued a Code of Conduct for Employees and a Code of Conduct for Suppliers, which both express a commitment to respect Human Rights. The Codes are accessible via the HIA downloads webpage: https://www.hai-aluminium.com/downloads
9.1b Human Rights Due Diligence (process)	Conformance	The HAI Group has conducted a documented Human Rights Due Diligence assessment. There are currently no salient issues with regard to Human Rights at the Entity.

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9.1c Human Rights Due Diligence (remediation)	Not Applicable	This Criterion is not applicable as the Human Rights assessment confirmed that there are no salient adverse Human Rights impacts present.
9.2 Women's Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. During the site tour, interviews and document review, no indication for deliberate Discrimination of women was observed. The HAI Group is reporting publicly on gender diversity indicators such as the number of female/male workers and male/female apprentices in the Sustainability Report 2020: https://www.hai-aluminium.com/wp-content/uploads/2022/05/Sustainability-report-2020-EN.pdf
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence identified.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity as no Resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity as no Resettlements are being considered or taking place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with Local Communities and therefore no need for action.
9.7b Local Communities (impacts)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human

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		Rights Due Diligence conducted has confirmed that there are no issues with Local Communities and therefore no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with Local Communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity follows the definition of Conflict-Affected and High-Risk Areas (CAHRAs) from the 'Armed Conflict Location Event Data Project and Peace Direct, please refer: www.acleddata.com www.peacedirect.org According to the list of suppliers, no supplies are sourced from a CAHRA.
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations caused by the security service. Security is operated by the neighbour company, an ASI Performance Standard Certified Entity.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to unite freely in the Labour Unions, seek representation and join the Workers' council without interference. A freely elected Worker representation process has been established.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to unite freely in the Labour Unions, seek representation and join the Workers' council without interference. A freely elected Worker representation process has been established. Collective Bargaining agreements with the Union and the Workers' representatives apply.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity as the right to Freedom of Association and Collective Bargaining is not restricted in Austria, where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker at the Entity is 19 years old.

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10.2b Child Labour (hazardous)	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker at the Entity is 19 years old.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour. The minimum working age of 15 years is respected. The youngest Worker at the Entity is 19 years old.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require Migrant Workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not hold Workers in debt bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable

CRITERION	RATING	COMMENT
		length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Code of Conduct. The Entity does not engage in or 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.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The lowest wage paid is well above the industry Collective Bargaining Agreement. Payments are made timely, in legal tender and fully documented.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely (blue collar workers at 15th of the following month, white collar workers latest at the last workday of the month), in legal tender and fully documented. Payments are made via transfer to employee's bank accounts.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Overtime is voluntary.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated its Occupational Health and Safety (OH&S) Policy. The certificate can be accessed via the following link: https://www.hai-aluminium.com/downloads
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated (e.g. via postings and intranet) the OH&S Policy. The OH&S Policy is

CRITERION	RATING	COMMENT
		publicly available on the HAI website, accessible via the following link: https://www.hai-aluminium.com/en/downloads
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	In its OH&S Policy statement, the Entity has included a commitment to international standards, legal and other requirements, accessible via the following link: https://www.hai-aluminium.com/downloads
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The authority to refuse or stop unsafe work is clearly described in the Workers safety manual ('Sicherheitshandbuch'). The policy is known to Workers.
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a joint health and safety committee, which meets four times per year. Additional mechanisms are in place, where Workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. The Entity is certified according to ISO 45001:2018.
11.4 OH&S performance	Conformance	The Entity is certified according to ISO 45001:2018. The Entity evaluates its Occupational Health and Safety (OH&S) performance regularly and several key performance indicators (leading and lagging) are related to OH&S. The Entity has several tools for evaluating performance and continuously improves its OH&S Management System.

Document Control and Version History

Revision	Date	Notes
0	4 May 2022	Initial Certification Audit - Full Certification