

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# HAMMERER ALUMINIUM INDUSTRIES EXTRUSION SRL

CERTIFICATE  
NUMBER

227

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

TÜV  
RHEINLAND  
CERT GmbH

DATE OF ISSUE

14 NOVEMBER 2022

DATE OF EXPIRY

13 NOVEMBER 2025

CERTIFIED SINCE

14 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', 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](http://www.aluminium-stewardship.org)**

CERTIFICATION SCOPE

Extrusion of aluminium profiles at Hammerer  
Aluminium Industries Extrusion SRL (Romania).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Hammerer Aluminium Industries
ENTITY NAME	Hammerer Aluminium Industries Extrusion SRL
CERTIFICATION SCOPE	Extrusion of aluminium profiles at Hammerer Aluminium Industries Extrusion SRL (Romania).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	25 July – 19 September 2022
AUDIT REPORT SUBMISSION	8 September 2022
AUDIT SCOPE	<p>The audit scope covers the extrusion of aluminium profiles at Hammerer Aluminium Industries Extrusion SRL (Romania).</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	Certification
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></ul>

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The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION  
PERIOD

14 November 2022 – 13 November 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

13 November 2025

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CERTIFICATE  
NUMBER

227

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## 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 the legal compliance requirements. The Entity has implemented systems (e.g., a legal database) to maintain awareness of and ensure compliance with Applicable Law. The Entity holds ISO 9001, ISO 14001 and ISO 45001 certifications from an accredited certification body. The HAI Group supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity has issued and communicated a Code of Conduct for Employees and Code of Conduct for Suppliers: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> An Anti-Corruption Policy is communicated internally. The Entity uses the 'Four Eyes Principle', and a table of authority is implemented. Basic training has been provided to employees on business ethics. More specific training for relevant staff had been scheduled for a time shortly after the audit. The HAI Group operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially. The financial system is periodically audited by an external tax auditor.
1.3 Code of Conduct	Conformance	The Entity has published and communicated a Code of Conduct for Employees in German and the local language: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> The Code clearly states that the Entity in no way tolerates Corruption, antitrust violations, bribery, money laundering, unfair advantages, or prohibited agreements.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained 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 current ISO 9001, ISO 14001 and ISO 45001 certifications from an accredited certification body.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the Entity's Environmental, Health and Safety Management System, senior management endorsement has been given and support, through provision of resources and annual review of the Policies, has been provided.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the Policies internally and externally as appropriate (e.g., HAI Group website, intranet). The Code of Conduct for Suppliers is actively communicated to relevant suppliers. Employees receive training regarding environmental, social, and governance Policies.
2.2 Leadership	Conformance	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 local team and the HAI Group. Responsibilities are reflected in organizational charts and job descriptions.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015. The system is certified by an accredited certification body, the certificate is accessible via the following link: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> During the recent external audit of the Management System, full compliance was confirmed and no non-conformity was raised.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an accredited Occupational Health and Safety Management System according to ISO 45001. There are no non-conformities open from the latest audit. The facets of Human and Labour Rights are also managed. Although the elements are present, the Social Management System is not yet fully formalised.
2.4 Responsible Sourcing	Conformance	The Entity has issued its sourcing policy in the Code of Conduct for Suppliers: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> The Entity's sourcing process is documented, and is in accordance with the requirements of the ASI Performance Standard. Regular Due Diligence and supplier evaluation is implemented, undertaken by the HAI central metal management department in Ranshofen, Austria, which conducts all metal purchasing for the Entity.
2.5 Impact Assessments	Conformance	The Entity has documented a Procedure for Impact Assessments. The Entity did not undergo nor has final plans for a New Project or Major Changes to the existing facility.
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented a site-specific Emergency Response Plan, that includes plausible scenarios. Emergency training (e.g. spill of

CRITERION	RATING	COMMENT
		chemicals) and evacuation drills have been undertaken.
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 at the HAI Group level, should it become relevant.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity did not undergo or plan a closure, decommissioning or divestment since the Entity became an ASI Member. However, a process has been defined to manage closure, decommissioning or divestment at the HAI Group level, should it become relevant. It is defined that environmental, social and governance issues shall be reviewed in such a case.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has disclosed its governance approach and its material environmental, social and economic impacts in the HAI Group Sustainability Report 2021, based on GRI G4 Guidelines: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
3.2 Non-compliance and liabilities	Conformance	Information about significant fines, judgments, penalties and non-monetary sanctions is included in the HAI Group Sustainability Report 2021, page 21: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes that conform to Anti-Corruption requirements related to payments to governments and facilitation of payments, including the Code of Conduct for Employees and for Suppliers: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> The Entity's management and confirmed by the report of the financial audit 2021, the Entity did not make government payments other than taxes, fees and social insurance. All payments are subject to annual external financial audit.
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. Stakeholders are made aware of contact details for the legal counsel in the Code of Conduct. The Sustainability Report 2021 encourages Stakeholders to raise concerns and a dedicated email address has been established:

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		<a href="mailto:ethics@hai-aluminium.com">ethics@hai-aluminium.com</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed a Life Cycle Assessment (LCA), prepared by a specialised external service provider, and based on ISO 14040 and ISO 14044.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed a Life Cycle Assessment (LCA), prepared by a specialised external service provider, and based on ISO 14040 and ISO 14044. To date, there have been no customer requests for the LCA information.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has not publicly communicated on Life Cycle Assessment (LCA), however LCA data are available on customer request.
4.2 Product design	Not Applicable	This Criterion is not applicable as the Entity has no design responsibility as all design requirements are provided by customers (both for extrusion and processing departments).
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented systems and a program to recycle 100% of its Aluminium Process Scrap at the sister site HAI Santana. Internally generated scrap is monitored monthly.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity is not required to separate scrap of different Aluminium grades, as all material has a similar chemical composition (6xxx series according EN 573-3).
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy that 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 only supplies Aluminium products to other businesses, not consumers. However, HAI Group closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their products, and works with national and international scrap dealers to secure the material for their remelting/casting plants.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Greenhouse Gas emissions and energy use are reported in the HAI Sustainability Report 2021, page 30: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
5.2 GHG emissions reductions	Conformance	The HAI Group has published GHG Emissions reduction targets in the HAI Sustainability Report 2021, page 31: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> The Entity has implemented an effective plan to achieve these targets.
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	Emissions to Air data are published in the HAI Sustainability Report 2021, page 30: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
6.2 Discharges to Water	Conformance	The Entity reports quantitative data on Discharges to Water in the HAI Sustainability Report 2021, page 32: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> Water meters monitor the municipal water and well water. The Entity has established a water minimisation plan.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Within the scope of the ISO 14001 certified Environmental Management System, the Entity periodically assesses the major risk areas related to Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented an Environmental Management System, including emergency, monitoring and communication procedures, to manage the major risks of Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The requirement to disclose to Affected Parties the volume, type and (potential) impact of significant Spills is documented in the Entity's ISO 14001 certified Environmental Management System. A procedure is documented and implemented to ensure that relevant authorities are informed immediately, should a Spill occur.



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6.4b Reporting of Spills (regular reporting)	Conformance	The requirement to disclose to Affected Parties the volume, type and (potential) impact of significant Spills is documented in the Entity's ISO 14001 certified Environmental Management System. Information to the public is made via the HAI Sustainability Report 2021, page 33: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> There were no significant releases of substances and no Spills or Leakages in the 2021 reporting year.
6.5a Waste management and reporting (strategy)	Conformance	In accordance with the 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 generated waste in the HAI Sustainability Report 2021, page 34: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 identified and mapped its water withdrawal and use by source and type. The documented water mapping identifies the source, use and destination of the water streams.
7.1b Water assessment (risk assessment)	Conformance	The risk assessment of impacts arising from water use as it relates to the source watershed did not identify major risks. This evaluation has been backed by the Entity's the water supplier.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as the water assessment did not identify material risks related to water withdrawal.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the water assessment did not identify material risks related to water withdrawal.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water withdrawal and use in the HAI Sustainability Report 2021, page 32: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a> The Entity did not identify water-related risks as material, therefore there are no direct data and statements incorporated in the Sustainability Report.

#### PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity assessment, conducted by a specialized consultant, and has implemented a Biodiversity Action Plan. Implementation of the Plan is monitored periodically.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has established and implemented a Biodiversity Action Plan that contains time-bound goals.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan reflects the Biodiversity Mitigation Hierarchy, as applicable. Biodiversity is discussed with the authority, as legally required, during the permit phase. The biodiversity assessment determined that further consultation with other external stakeholders was not required.

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8.2c Biodiversity management (reporting)	Minor Non-Conformance	The biodiversity assessment did not identify any material issues. However, this fact has not been reported in the HAI Sustainability Report, page 35: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
8.3 Alien Species	Minor Non-Conformance	The biodiversity assessment, which included the topic of Alien Species, did not identify any need for action. However, the scope of the assessment was limited to the Entity's premises and did not consider the potential migration of Alien Species caused by the transport of goods. For some, but not all suppliers of wood, the Entity is supplied with wood that is conformant with the International Standard for Phytosanitary Measures (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 have been communicated to employees (via postings, training and intranet) and other Stakeholders (via letters, internet), and are accessible via the following link: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has undertaken a documented Human Rights Due Diligence assessment, but consultation of external Stakeholders was not systematic.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity's Human Rights assessment confirmed that there are no salient adverse Human Rights impacts present. Indigenous Peoples are not present in the region or in the Entity's Area of Influence.
9.2 Women's Rights	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes that conform to the requirements on women's rights. No indication for deliberate Discrimination of women was observed

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		during the audit.42% of leadership positions are female. In accordance with national law, the Entity grants up to two years paid maternity leave.
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 Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity as no Resettlements are being considered or have taken place 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 have taken place 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 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 is required. However, the Entity is actively supporting the Community with various campaigns (e.g., English lessons for children, health education, maintaining a community park).
9.7b Local Communities (impacts)	Not Applicable	This Criterion 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 is required.
9.7c Local Communities (livelihoods)	Conformance	The Entity is actively supporting the Local Community with various campaigns (e.g., English lessons for children, health education, maintaining a community park).
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located in or near a Conflict-Affected and High-Risk Area (CAHRA). The Entity follows the

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		<p>definition of CAHRAs from the 'Armed Conflict Location Event Data Project' and Peace Direct, please refer:  <a href="http://www.acleddata.com">www.acleddata.com</a>  <a href="http://www.peacedirect.org">www.peacedirect.org</a></p> <p>According to the list of suppliers, no supplies are sourced from a CAHRA. The Entity's metal supply is managed from HAI Headquarters in Ranshofen, Austria.</p>
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 appropriate behaviour of the security staff.
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. A union is not represented at the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the right to Collective Bargaining. Worker representatives and management at the Entity have negotiated a Collective Bargaining Agreement (CBA).
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 Romania, where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has implemented a Code of Conduct that commits to the prohibition of Child Labour:  <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a></p> <p>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 was 18 years old. The Entity has established practices to ensure that children are not employed.</p>
10.2b Child Labour (hazardous)	Conformance	The Entity neither uses nor supports the use of Child Labour. Persons below the age of 18 years were not employed at the time of the audit.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour, nor does it engage in or support the Worst Forms of Child Labour.

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10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.
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.
10.3c Forced Labour (migrant workers)	Conformance	Migrant Workers make up approximately one percent of the Entity's workforce. No workers are required to lodge deposits or security payments at any time.
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 unreasonably restrict the freedom of movement of Workers in the workplace, and does not employ armed security staff.
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 documents and only copies of training certificates are retained in the personnel files.
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 length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	Interviews and document review confirmed that the Entity does not deliberately discriminate. The gender ratio is considered balanced (>40% female employees) and women are present in management positions.
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. Management meets regularly with Workers and their

CRITERION	RATING	COMMENT
		representatives. Various information channels have also been established (e.g., access to intranet, info screens in the canteen).
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. Workers reported that there is a good working atmosphere and that they are treated respectfully.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week exceed the legal minimum standard.
10.7b Remuneration (method of payment)	Conformance	Payments to Workers are made by the Entity in full, monthly via bank transfer. Workers receive payslips that list all necessary information on hours worked, surcharges and deductions.
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 not excessive. Minimum annual leave is 23 days, more days are granted depending on the length of service.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has documented and implemented an OH&S Management System that is certified to ISO 45001:2018 by an accredited certification body. The Entity has implemented and communicated its Occupational Health and Safety (OH&S) Policy. The certificate and the Policy are publicly available: <a href="https://www.hai-aluminium.com/downloads">https://www.hai-aluminium.com/downloads</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented and communicated (via postings, intranet) an Occupational Health and Safety (OH&S) Policy. Although not explicitly stated in the Policy, the system design ensures applicability of the Policy to all Workers and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has included in the OH&S Policy statement and in the Codes of Conduct, a commitment to comply with Applicable Law on Workers' health and safety and international standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The authority to refuse or stop unsafe work is expressly stated in the Entity's safety manual, which is made available and communicated to all employees.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has documented and implemented an OH&S Management System that is certified to ISO 45001:2018 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 have been implemented, such as toolbox meetings, where Workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. Worker representatives meet regularly and on demand with site management.
11.4 OH&S performance	Conformance	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	14 November 2022	Initial Certification Audit - Full Certification