
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

BRIDGNORTH ALUMINIUM

CERTIFICATE
NUMBER

58

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

14 DECEMBER 2022

DATE OF EXPIRY

13 DECEMBER 2025

CERTIFIED SINCE

14 DECEMBER 2019

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

Activities undertaken at Bridgnorth Aluminium Ltd
(UK).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Bridgnorth Aluminium
ENTITY NAME	Bridgnorth Aluminium Limited
CERTIFICATION SCOPE	Activities undertaken at Bridgnorth Aluminium Ltd (UK)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)Other manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (28 – 30 October 2019)Re-Certification Audit (8 – 10 November 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">28 – 30 October 2019 (Initial Certification Audit)8 – 10 November 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">3 December 2019 (Initial Certification Audit)3 January 2023 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (28 – 30 October 2019)</u></p> <p>Activities undertaken at Bridgnorth Aluminium Ltd. currently include those to manufacture Lithographic plates, foil, transformer windings and formable aluminium strips/coils for automotive heat and sound absorbing components</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)Other manufacturing or sale of products containing Aluminium

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

Re-Certification Audit (8 – 10 November 2022)

Activities undertaken at Bridgnorth Aluminium Ltd. currently include those to manufacture Lithographic plates, foil, transformer windings and formable aluminium strips/coils for automotive heat and sound absorbing components

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)
- Other manufacturing or sale of products containing Aluminium

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

14 December 2022 – 13 December 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

14 July 2024

CERTIFICATE
NUMBER

58

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity subscribes to a proprietary legal update service, uses its subject matter experts and their networks and has a legal register and training systems in place to maintain awareness of and ensure compliance with Applicable Law. It has implemented an internal system to track implementation which it is developing.
1.2 Anti-Corruption	Conformance	The Entity has a Code of Conduct which covers anti-bribery, financial integrity, conflicts of interest, donations, sponsorships, gifts and entertainment policy available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility It works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards as evidenced by covering the Code of Conduct in all inductions, ongoing training including assessments, and a system to remind users if training is overdue. It has implemented a system to confirm supplier understanding and implementation of its Supplier Code of Conduct.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility which includes principles relevant to environmental, social and governance performance. All employees are trained in the Code. It also has a Supplier Code of Conduct and requests and tracks supplier responses confirming their understanding and implementation of the Code.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has separated the integrated policy into three policies: Sustainability (with a focus on the Environment), Health and Safety and Quality, whilst still operating an integrated system. The Sustainability Policy is available at: https://www.bridgnorthaluminium.co.uk/files/Documents-Downloads/EHS112%20Sustainability%20Policy-2.pdf

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management has endorsed the Policy Statements which are regularly reviewed and supported through the provision of adequate resources.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its policies and expectations to employees, Contractors and suppliers using training, proprietary systems, and communications. The Sustainability Policy, Supplier Code of Conduct and reporting are available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
2.2 Leadership	Conformance	The Entity has nominated the Sustainability Manager as the senior Management Representative who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard. This is endorsed by the CEO. Viohalco, the corporate owner of the Entity has implemented a Strategic environmental, social, and governance (ESG) roadmap which includes each site having a Board of Director role with oversight of ESG issues, including ASI implementation.
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	The Entity manages a certified Environmental Management System within an integrated Management System Certificate. The Management System was audited in September 2022 and is ISO 14001 certified. This certificate was issued with six minor non-conformities and the Entity is developing corrective action plans in place to close the non-conformities. The certificates are available at: https://www.bridgnorthaluminium.co.uk/home
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has systems in place to manage social issues, labour, and Human Rights as evidenced by electronic and paper based human resources and procurement systems, a Code of Conduct for suppliers and employees, as well as meeting records, allocated responsibilities, training records, communications and other evidence reviewed on site.
2.4 Responsible Sourcing	Conformance	The Entity has implemented an updated supplier Code of Conduct available on the website: https://www.bridgnorthaluminium.co.uk/files/Documents-Downloads/6299%20BAL%20Code%20Of%20Conduct%20Document_V1.pdf

CRITERION	RATING	COMMENT
		A copy is provided to all suppliers who are required to acknowledge it. It covers environmental, social and governance issues. Additional procedures are in place to evaluate risks in the supply chain, supplier risks and to monitor conformance against the Code of Conduct through the use of third party assessment, supplier questionnaires, procurement procedures and other documentation.
2.5 Impact Assessments	Minor Non-Conformance	The Entity conducts Environmental and Health and Safety Assessments for new capital expenditure projects over a threshold value which includes any major changes to existing Facilities. This was evidenced through the documented capital expenditure review process. However, evidence from recent changes on site indicated that gender and broader Human Rights Impact Assessments were not considered.
2.6 Emergency Response Plan	Conformance	The Entity has a site specific Emergency Response Team (ERT) plan developed in collaboration with Workers and their representatives, and relevant agencies according to its integrated Management System.
2.7 Mergers and Acquisitions	Conformance	The Viohalco Group which owns the Entity has a procedure in place that defines the Due Diligence process for mergers and acquisitions and covers environmental, social and governance issues. There have been no mergers or acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Viohalco Group which owns the Entity has a procedure in place that defines the process for closure, decommissioning and divestment and covers environmental, social and governance issues. There has been no significant closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity publicly discloses its governance approach and limited information about some material environmental, social, and economic impacts, mainly driven by statutory requirements and without contextual narrative, therefore not fully meeting the requirements of this criterion. More information is available at: https://www.bridgnorthaluminium.co.uk/news and https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity has processes in place to publicly disclose information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law. It has not had any significant reportable regulatory breaches in recent years.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has only made payments to governments on a legal and/or contractual basis as evidenced by the most recent set of reports and accounts and the Code of Conduct. Both are available at: https://www.bridgnorthaluminium.co.uk/information/5a4b45143ac1b/Reports-Financials and https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility
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 an integrated Management System certification which requires a Complaints Resolution Mechanism in place that is accessible, transparent, understandable, and culturally and gender sensitive, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. The Entity has implemented a third party managed integrity hotline, available at: https://www.bridgnorthaluminium.co.uk/integrityhotline
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for Lithographic and Foil products which cover more than 80% of its products and makes the Life Cycle Assessment (LCA) report available to customers on request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity can provide cradle-to-gate and end of LCA information on its Aluminium products for Lithographic and Foilstock which represents approximately 80% of its business by turnover.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has cradle-to-gate and end of LCA information on its Lithographic and Foilstock products which represent approximately 80% of its production. The LCA's contains full details of underlying assumptions and system boundaries and there is a summary document available for customers and broader Stakeholders on request.

CRITERION	RATING	COMMENT
4.2 Product design	Conformance	The Entity has a research and development process that considers sustainability impacts and contains objectives to enhance sustainability in the design and development process for products, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and collects 100% of process scrap for re-use within its process. No scrap Aluminium leaves the site.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys and grades for recycling as evidenced by the scrap management process and plans as well as site observation.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, which includes broad objectives focused on engaging with customers and users via industry bodies to encourage the recycling of all Aluminium. Its main Lithographical products enter the recycling system at other plants as they are highly valuable and easy to collect from the end users – printers. Other products also enter recycling systems to a large degree. There are technological limitations currently, and investment would be needed to enable higher use of main product categories in the remelting process.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with national and international industries and collection and recycling systems as well as with customers to support accurate measurement and efforts to increase recycling rates for Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses material Greenhouse Gas (GHG) emissions and energy uses by main sources on an annual basis in the Annual Report and Accounts. For more information see the Strategic Report, page 4: https://www.bridgnorthaluminium.co.uk/files/BA%20Stats%20-%202021.pdf
5.2 GHG emissions reductions	Conformance	The Entity has a carbon reduction plan with projects budgeted to reduce direct emissions. The Entity buys 100% certified renewable electricity and imports renewable electricity from a local farm based 'biogester' produced energy provider, which provides approximately 40% of its direct energy requirements. The Entity also has carbon reduction targets for its direct GHG emissions and related to the embodied

CRITERION	RATING	COMMENT
		emissions of incoming materials especially metal, which are the most material GHG emissions.
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	The Entity quantifies and reports Emissions to Air that have adverse effects on humans or the environment and implements plans to minimise these adverse impacts as evidenced by the documentation reviewed, management testimonial and observation.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports Discharges to Water and assesses potential adverse effects on humans or the environment and has plans in place to minimise these adverse impacts as evidenced by discharge consents and permitting requirements confirmed by the local Environment Agency.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted assessments of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil, and has management plans in place as evidenced through its Emergency Response Team Manual and risk assessment documentation.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has a management, internal and external communication plan, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage as evidenced by the Emergency Response Team Manual. It has proactive and reactive monitoring in place, and communication plans.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place to disclose to affected parties the volume, type, and potential impact of significant spills immediately after an incident. Evidence included a review of documentation relating to two minor permit breaches, which demonstrated the effectiveness of controls and communication with the Environment Agency.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The Entity has published information on impact assessments, spill incidents and remediation actions

CRITERION	RATING	COMMENT
		taken, including via the Environment Agency. However, this information is not sufficient and the Sustainability Report has not been updated since 2019.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy and action plans to achieve it evidenced by documentation, site observation and Worker interviews.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity publicly discloses on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity via the Environment Agency's pollution inventory dataset. However, it has not updated its Sustainability Report and there is little context and no reporting of associated waste disposal methods.
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 (start 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)	Conformance	The Entity seeks to minimise the Aluminium content in Dross evidenced by procedures and maximise the recovery of Aluminium by treatment of Dross and Dross residues as evidenced through process documentation review, observation, and documentation from their Dross suppliers.
6.8b Dross (recycling)	Conformance	The Entity seeks to maximise the recycling of treated Dross residues as is evidenced by the supplier contract, Aluminium recovery records, documented procedures on site and observation.
6.8c Dross (review of alternatives)	Not Applicable	The Entity recovers 100% of its Dross which is sent for recovery and recycling to two suppliers. It does not landfill any Dross. This was evidenced by melted metal procedures, waste transfer notes and summary business reporting.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water withdrawal and use by mains source and sub-meters. It draws all its water from the mains as evidenced by invoices and water balance documentation. It has budgeted plans to repeat and conduct a more detailed mass balance survey.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks in Watersheds in the Entity's Area of Influence as evidenced by its risk assessment as part of its Environmental Management Systems certification.
7.2a Water management (management plans)	Conformance	The Entity has a water management plan that addresses material risks identified in the risk assessment. It provides targets for improvement. This is evidenced by the plan and risk assessments.
7.2b Water management (monitoring)	Conformance	The Entity monitors the effectiveness of its Water Management plans, which are regularly updated as evidenced by the Management systems review meeting schedule.
7.3 Disclosure of water usage and risks	Minor Non-Conformance	The Entity has reported on water withdrawal and use and discloses material water-related risks which have not changed substantially since the publication of the Entity's Sustainability Report 2019. https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility

PRINCIPLE 8 BIODIVERSITY

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence, which includes the surrounding land, some broadleaved woodland and hedgerows, its airshed and local influence on the Watershed of the Severn River (approximately 500 metres away) as evidenced by its Preliminary Ecological Assessment. There are no Associated Facilities related to the site and its location in an industrial estate on the edge of a small town means that transport impacts relate to the established road network. The report stated minimal risk with no material impact. The risk assessments have been repeated and action plans refreshed.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has implemented a Biodiversity Action Plan, which was reviewed, with time-bound targets to address material impacts identified in the risk assessment and is monitoring its effectiveness. Evidence was provided of implemented actions, a repeat assessment, and updated plans.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed in consultation with local experts and is designed in accordance with the Biodiversity Mitigation Hierarchy as evidenced by document review and local stakeholder interviews.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	The achieved biodiversity outcomes are shared with Stakeholders and made publicly available through the company's newsletter and Sustainability Report (https://www.bridgnorthaluminium.co.uk/news). A refresh of its biodiversity risk assessment study has been completed over recent weeks with an update to the public report pending.
8.3 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity as evidenced by its updated biodiversity assessment and management plan.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 a Code of Conduct relating to the respect of Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, available at: https://www.bridgnorthaluminium.co.uk/information/5810d0aa43066/Sustainability-and-Social-Responsibility This is communicated to employees in the employee handbook and training. The Entity also has a supplier Code of Conduct and is risk assessing key suppliers for Human Rights risks.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process that seeks to identify, prevent, mitigate, and account for how it addresses its actual and potential impacts on Human Rights. This was evidenced by a range of documents and processes observed on site and is commensurate with the size and scale of the operation and its risk environment. The biggest risks relate to its supply chain. This is now being assessed by a process coordinated by Viohalco, the Entity's owner and is targeting key suppliers.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has processes to understand any potential Human Rights infringements at the site and to remediate them through legitimate processes. This was evidenced through its whistleblowing and complaints mechanism and a process to resolve disputes as well as extensive work being done through the ESG roadmap and supplier Due Diligence. This is currently at the risk assessment stage and therefore no infringements have been identified and no remediation is required.
9.2 Women's Rights	Conformance	The Entity has implemented policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). This forms part of its anti-Discrimination efforts. This was evidenced by its Code of Conduct, policies, gender pay reporting and review of female facilities.

CRITERION	RATING	COMMENT
		It seeks greater participation of women in the Workplace. This is challenging in the industrial operations environment, where representation levels are low and better in the management environment.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the area.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the area.
9.5 Cultural and sacred heritage	Conformance	The Entity consults with Local Communities and has cooperatively identified that it does not negatively impact cultural heritage sites in the region.
9.6a Resettlements (avoid or minimise)	Not Applicable	No resettlement was required for the site and there are no expansion plans.
9.6b Resettlements (where unavoidable)	Not Applicable	No resettlement was required for the site and there are no expansion plans.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. This was evidenced through Stakeholder interviews with local Workers and community members.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. This was evidenced by its management practices on site, its complaint mechanisms, and processes as well as stakeholder feedback.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with Local Communities opportunities to respect and support their livelihoods and plays a key role in Bridgnorth as the town's second largest employer. This was evidenced by stakeholder interviews and documentation.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has processes in place to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The risk is in the procurement of metals used in the alloying process, which is managed through risk assessments of suppliers. This process is ongoing and potential risks identified are being reviewed at the supplier level.
9.9 Security practice	Conformance	The Entity employs private security providers and requires them to respect Human Rights in line with recognised standards and good practices. The

CRITERION	RATING	COMMENT
		supplier has been sent the Supplier Code of Conduct which requires them to respect Human Rights.
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 associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law, in line with the International Labour Organisation (ILO) Conventions C87 and C98 as evidenced by UK law and union representation on site.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, participates in any Collective Bargaining process in good faith and adheres to the collective bargaining agreements in place. This was evidenced by the collective bargaining document and through interviews with Union representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity allows Freedom of Association and Collective Bargaining, in line with UK law. A collective bargaining agreement is in place at the Entity. Non-unionised employees can provide input into management views and opinions as evidenced through Worker interviews.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use nor support the use of Child Labour as defined in ILO Conventions C138 and C182 and complies with related national and international law. This was evidenced through the Code of Conduct, Worker interviews and observations.
10.2b Child Labour (hazardous)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182 and complies with related national and international law and its young Workers are subject to risk assessment and are not engaging in Hazardous activities. This was evidenced through the Code of Conduct, Worker interviews and observations.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182 and shall comply with related national and international law including not engaging in or supporting the Worst Forms of Child Labour. This was evidenced through the Code of Conduct, risk assessments of apprentice young Workers, Worker interviews and observations.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in or support Human Trafficking as per its Code of Conduct and does not use recruitment agencies. This was evidenced through the Code of Conduct, risk assessments of suppliers, and anti-slavery statement available at: https://www.bridgnorthaluminium.co.uk/information/5a4b45143ac1b/Reports-Financials
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers and does not use recruitment agencies. This was evidenced through Human Resource records and the Code of Conduct. Its modern slavery statement is available at: https://www.bridgnorthaluminium.co.uk/information/5a4b45143ac1b/Reports-Financials
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105 and does not employ Migrant Workers. This was evidenced through Human Resource records, Worker, and Management interviews.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not hold Workers in Debt Bondage or force them to work to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. This was evidenced through the Code of Conduct, Worker and management interviews and observations on site.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not retain original copies of Workers' identity papers, work permits, or travel documents as evidenced through human resources records viewed on site. It provides access to Worker

CRITERION	RATING	COMMENT
		training certificates and training records, confirmed on site through Worker interviews.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length. This was evidenced through Worker interviews and leaving process documentation.
10.4 Non-Discrimination	Conformance	The Entity has provisions in place to ensure equal opportunities and 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, in line with ILO Conventions C100 and C111.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment. This was evidenced through Worker interviews, policy, and documentation.
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. This was evidenced through the review of processes and case records while on site. It has also introduced an integrity helpline.
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 always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income. This was evidenced through a review of payroll records and Worker interviews.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments that are timely, in legal tender and fully documented. This was evidenced through payroll records and Worker interviews.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. This was evidenced through a review of the timesheet and payroll data and Worker interviews.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity implements, communicates and regularly reviews an Occupational Health and Safety (OH&S) Policy that senior management has endorsed and supports through the provision of resources.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Minor Non-Conformance	The Entity applies its OH&S Policy to all Workers and Visitors present in any area or activities under the Entity's control, although an exception where the policy was not followed was identified.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has included in its Health and Safety Policy a commitment to comply with Applicable Laws on Workers' health and safety and international standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has included in its Health and Safety Policy the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. This is supported through training.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has an integrated Management System certificated to ISO 45001 for health and safety. The certificate is available at: https://www.bridgnorthaluminium.co.uk/home There were six minor non-conformities relating to Health and Safety resulting from the September 2022 audit, which had not had corrective action plans put in place.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism, its Health and Safety Committee, by which they can raise, discuss, and participate in the resolution of OH&S issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance using leading and lagging indicators, compares this with peers and best practices where available, and strives to continuously improve.

Document Control and Version History

Revision	Date	Notes
0	14 December 2019	Initial Certification Audit – Full Certification
1	18 December 2022	Re-certification Audit