

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Capral Aluminium

CERTIFICATE NUMBER  
**287**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3 2022)**

CERTIFICATION  
LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.**

DATE OF ISSUE  
**2 JUNE 2023**

DATE OF EXPIRY  
**1 JUNE 2026**

CERTIFIED SINCE  
**2 JUNE 2023**

## AUTHORISED BY

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

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

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

## CERTIFICATION SCOPE

The extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Capral Aluminium
ENTITY NAME	Capral Aluminium
CERTIFICATION SCOPE	The extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>6 – 17 March 2023</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>11 May 2023</li></ul>
AUDIT SCOPE	<p>The audit scope covers the extrusion, warehousing and distribution of Aluminium Product and Services across Capral Australia's operations.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Semi-Fabrication</li><li>Material Conversion</li></ul> <p>All applicable 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><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	2 June 2023 – 1 June 2026

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NEXT AUDIT TYPE                      Surveillance Audit

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NEXT AUDIT DATE                      2 December 2024

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CERTIFICATE NUMBER                      287

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

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

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

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## ENTITY OVERVIEW

Capral is an Australian Aluminium extrusion company, publicly listed on the Australian Stock Exchange (ASX:CAA). It commenced operations in Australia in 1936 and is Australia's largest manufacturer and distributor of aluminium profiles, with net assets of approximately \$135 million. Capral has a national footprint of world class aluminium extrusion plants, comprising of nine operating presses with an annual capacity of 74,000TN. Capral has an extensive distribution network, consisting of major distribution facilities, as well as regional and metropolitan centres with an extensive range of products and logistics capabilities. Capral is a major supplier to fabricators and distributors, focusing on the Residential, Commercial and Industrial segments. Capral employs over 900 people within its operations throughout Australia, with significant industry skills and expertise.

For further information, refer to: <https://www.capral.com.au/about-capral/our-story/>

## MATURITY RATINGS

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

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

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

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has appropriate systems in place to maintain awareness, ensure compliance with Applicable Law and maintain a context-sensitive commitment to customary and/or traditional practices. This is evidenced by the Entity's legal registers, code of conduct, business continuity plan, and relevant policies.
1.2 Anti-Corruption	Conformance	The Entity has demonstrated a commitment to working against Corruption in all its forms, including Extortion and Bribery. Furthermore, it has ensured that anti-Corruption is tackled in ways consistent with Applicable Law and relevant international standards as demonstrated in their Code of Conduct and reinforced by existing state audit law.
1.3a-e Code of Conduct	Conformance	<p>The Entity has a comprehensive approach to maintaining its own integrity and that of its respective stakeholders. The Capral Code of Conduct (October 2022) provides a standardised framework to guide business and operational practices.</p> <p>It is publicly available and the Entity has ensured an effective systematic review and update process is included as a part of the Entity's activities. This has helped to ensure that changes to the organisation's documentation is reflective of any operational changes, as well as any ensuing impacts on environmental, social and governance related risks.</p> <p><a href="https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Capral-Code-of-Conduct_Oct2022.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Capral-Code-of-Conduct_Oct2022.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity's relevant environmental, social and governance (ESG) Policies and procedures remain sensitive to the need to incorporate senior management as a part of the implementation and review process. The Entity has successfully monitored and ensured that this is the case.</p> <p>The Entity has demonstrated leadership commitment by endorsing and periodically reviewing various policies covering environmental, social and governance factors and by providing resources as needed for its implementation.</p> <p>The Entity has effectively communicated the Environmental, Social and Governance Policy to its Stakeholders.</p>
2.2a-c Leadership	Conformance	The Entity has nominated one of its senior management personnel (Group ESG, Sustainability & Distribution Human Resources Manager) as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity maintains ISO 14001:2015, 45001:2018 and 9001:2015 certification, which is subjected to periodic audits by an independent accredited certification body.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity maintains ISO 14001:2015, 45001:2018 and 9001:2015 certification, which is subjected to periodic audits by an independent accredited certification body. The Entity also upholds group-wide policies that safeguard social welfare of Stakeholders and implements specific ESG Management Plans customised to operational sites.
2.4a-e Responsible Sourcing	Conformance	The Entity has established a system by which the Due Diligence for suppliers is managed in terms of environmental and social performance criteria. Key policies and practices on responsible sourcing and modern slavery are in place and reviewed every five years. Responsible Ethical Sourcing and Modern Slavery Policy:  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/Ethical-Sourcing-and-Modern-Slavery-Policy.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/Ethical-Sourcing-and-Modern-Slavery-Policy.pdf</a>
2.5a-g Environmental and Social Impact Assessments	Conformance	Where appropriate, the Entity has shown a commitment to conducting relevant Impact Assessments in order to establish an understanding of respective baseline conditions, prospective impacts as a result of its activities and associated mitigation efforts required. The Entity has also demonstrated that these Impact Assessments are periodically reviewed and updated.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable as the Entity is not required to conduct this Impact Assessment as no New Projects or Major Changes have occurred or are proposed. The assessment process however is documented in Environmental, Social and Governance Management Practices. No groups of Indigenous Persons were also identified by the current operations.
2.7a-f Emergency Response Plan	Conformance	A well-designed and site specific Emergency Response Plan has been established by the Entity. The plan has been developed in collaboration with Workers, Contractors and other relevant Stakeholders. Importantly, the Entity has also put a review process in place to account for both temporal and operational changes. The integrity of these plans and procedures are evidenced by the Entity's Management Systems certifications.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/2020/05/PIRMP-Capral-Apr-2021-Website.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/2020/05/PIRMP-Capral-Apr-2021-Website.pdf</a>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Plan and a well-structured Risk Management System to effectively navigate instances of operational closure, decommissioning or divestment, in case these occur in future.
2.9a-b Mergers and Acquisitions	Conformance	Whilst the Entity has not been involved in any recent mergers or acquisitions and there are no plans for such arrangements in the near future, specific procedures are in place as covered in their Environmental Social and Governance Management Practices, which clearly states that ESG considerations will be reviewed using a due diligence process in addition to standard financial due diligence.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Whilst the Entity has not closed, decommissioned or divested from any of its Facilities, it is aware of the requirements to review environmental, social and governance issues and intends to apply the same if required in the future. Specific procedures are in place and covered in their Environmental Social and Governance Management Practices,

CRITERION	RATING	COMMENT
		stating that planning processes for this purpose will be based on an ongoing assessment, identification, and mitigation of risks found in environmental and social policies, practices, procedures, and plans.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's annual sustainability reports are published as part of their Annual Reports. The Annual Report 2021 includes a sustainability section, pages 17 –20. The Annual Report 2022 includes a sustainability section, pages 15 – 19:</p> <p><a href="https://www.capral.com.au/about-capral/general-information/annual-reports">https://www.capral.com.au/about-capral/general-information/annual-reports</a></p>
3.2 Non-compliance and Liabilities	Conformance	As it is a legal requirement to report through the ASX platform, the Entity publicly discloses information on an annual basis relating to material fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.
3.3a-c Payments to Governments	Conformance	<p>As part of the Entity's ESG Management Practices, procedures are in place ensuring any payments to the government made by or on its behalf have a solid legal and/or contractual basis. Financial auditing is undertaken as required by applicable law and/or directed by the Entity's risk control measures.</p> <p>The Entity's financial records, including payments to governments, are periodically third party audited to ensure that the Entity meets its compliance obligations.</p> <p><a href="https://www.capral.com.au/about-capral/general-information/annual-reports">https://www.capral.com.au/about-capral/general-information/annual-reports</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible, transparent, understandable and culturally and gender sensitive Dispute Settlement and Complaints Resolution, adequate to address all relevant Stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>Corporate Governance: <a href="https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Corporate-Governance-Statement-April-2021.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Corporate-Governance-Statement-April-2021.pdf</a></p> <p>Whistleblower Policy: <a href="https://www.capral.com.au/wordpress/wp-content/uploads/2020/02/Whistleblower-Policy.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/2020/02/Whistleblower-Policy.pdf</a></p> <p>Code of Conduct: <a href="https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Capral-Code-of-Conduct_Oct2022.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/2019/03/Capral-Code-of-Conduct_Oct2022.pdf</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a framework for the Life Cycle Assessment (LCA) to address the environmental impacts associated with production of Aluminium. The LCA report is available for all its production lines and Products.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity is providing adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) Product(s) when requested. The Entity is responsive to customer enquiries and needs and has made the LCA document available for public access.

CRITERION	RATING	COMMENT
4.2 Product Design	Conformance	In collaboration with key clients, the Entity integrates techniques for optimal material consumption in the design and manufacturing process of the Products in terms of dies design, product profiles, and process engineering that minimises or eliminates scrap and reject material.
4.3a-b Aluminium Process Scrap	Conformance	As reduction of Aluminium scrap is part of the KPIs in the Entity's Performance Hub software, there is clear evidence that the Entity has taken initiatives to minimise Aluminium Process Scrap across its operations.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The ability of the Entity to utilise End of Life Products from consumers was investigated within the Life Cycle Assessment. The retrieval of scrap is reviewed annually and tied to the performance criteria of the sites, albeit recovery from customers is limited due to the various alloys used and contamination risks. The Entity is currently developing a program of educating their customers on circularity and best practice recycling which has been implemented in their ESG plans.
4.4d Collection and Recycling of Products at End of Life	Conformance	The ability of the Entity to utilise End of Life Products from consumers was investigated within the Life Cycle Assessment. The retrieval of scrap is reviewed annually and tied to the performance criteria of the sites, albeit recovery from customers is limited due to the various alloys used and contamination risks. The Entity is currently developing a program of educating their customers on circularity and best practice recycling which has been implemented in their ESG plans.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has taken the appropriate steps to ensure that organisational emissions are effectively accounted, reported, and disclosed on an annual basis. Emission sources cited were also consistent with the Entity's LCA document. Carbon emissions are also reported on the National Greenhouse and Energy Reporting (NGER) website.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/CAP55429-Capral-AR-Dec-2021_vFs-Final.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/CAP55429-Capral-AR-Dec-2021_vFs-Final.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has published the initiatives that have been developed to reduce their GHG emissions. However, the target reduction amounts and timeline that are documented in their Carbon Reduction Plan are not yet publicly accessible.  <a href="https://www.capral.com.au/blog/blog/our-sustainability-roadmap-the-new-norm/">https://www.capral.com.au/blog/blog/our-sustainability-roadmap-the-new-norm/</a>



CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity has recognised the importance of managing carbon emissions from their operations in achieving their targets toward a long-term goal of carbon neutrality. The Entity refers to their Carbon Reduction Plan and Sustainability Roadmap and utilises an automated reporting tool to evaluate operational KPIs and limit direct emissions where feasible.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has established procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts, as stated in each site's ESG Plan.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf</a>
6.2a-g Discharges to Water	Conformance	The Entity has established procedures to quantify and report Discharges to Water that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts, as stated in each site's ESG Plan.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has ensured to appropriately assess, mitigate, and manage its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate spills and/or leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has taken the appropriate measures to ensure that any Spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose spills and the remediation actions taken.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management plans for each site. The Entity has also taken the appropriate steps to quantify the amount of both Hazardous and Non-Hazardous Waste generated across operations.  However, the Entity has not publicly disclosed waste generation and disposal data and information.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. WATER STEWARDSHIP</b>		

CRITERION	RATING	COMMENT
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has provided details on its water withdrawal and use by source and type through each site's ESG Plans and has undertaken an assessment of water-related risks in its Area of Influence for each site.
7.2a-e Water Management	Conformance	The Entity has established and publicly disclose individual water management plans for each site and conducted comprehensive risk assessment and management that are determined with Stakeholder consultation where necessary.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Smithfield-ESG-Plan.pdf</a>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed that its operations have no significant and Material risks on Biodiversity and land-use related activities across the Entity's Area of Influence. The Entity has undertaken a systematic review process to identify pertinent Biodiversity related risks and is evidenced by the sections in corresponding ESG Plans for each of the Entity's operational sites.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has assessed that its operations have no significant and Material risks on Biodiversity and land-use related activities across the company's Area of Influence. While this is the case, the Entity has undertaken a systematic review process to identify pertinent biodiversity related risks and is evidenced by the sections in corresponding ESG Plans for each of the Entity's operational sites.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable as the Entity's operational effects on Biodiversity and Ecosystem Services are very minimal to none as the Facilities are located in highly industrial areas/zones.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as the Entity's operational effects on Biodiversity and Ecosystem Services are very minimal to none as the Facilities are located in highly industrial areas/zones.
8.4 Alien Species	Conformance	The Entity strictly adheres to cross-border regulations, the Entity applies extensive processes and procedures to prevent accidental or deliberate introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is committed to avoid operating in World Heritage Properties as documented in their ESG Management Plans. The Entity has not expressed any intention to explore or develop New Projects in the near future that would require land elsewhere.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as the Entity's Facilities are located in highly industrial areas/zones, not adjacent or near any Protected Areas or has impact on them.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity understands its social and civic responsibility to the public and ensures it operates in a way that fulfils its responsibilities to employees, host Communities, and other Stakeholders. Committing to their Code of Conduct, relevant policies, and ESG Management Plans, the Entity ensures to observe the UN Guiding Principles on Business and Human Rights as well as the relevant laws in Australia, which incorporate all Human Rights requirements as strengthened by various international accords and conventions.</p> <p>The Entity's Human Right Policy is covered under the Responsible Sourcing and Modern Slavery Policy 2022, available at:</p> <p><a href="https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance">https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity is required to report gender equality requirements annually to the Workplace Gender Equality Agency (WGEA). The report is published on the Entity's website, as well as the WGEA website. Additionally, the Entity has its Diversity and Inclusion Policy on their website and discloses their activities and commitment in the Annual Report.</p> <p><a href="https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance">https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance</a></p> <p><a href="https://www.capral.com.au/wordpress/about-capral/general-information/annual-reports">https://www.capral.com.au/wordpress/about-capral/general-information/annual-reports</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as there are no identified cultural and sacred heritage features within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no identified cultural and sacred heritage features within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as there have been no incidence of displacement during the construction and operation of the Entity.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Not Applicable	There are no adjacent residential communities that are located near the Entity's Facilities. While this is the case, the Entity proactively conducts Environment and Social Impact Assessment (ESIA) and initiates engagement plans for any New Project to ensure that any adverse impact on the rights and interests of Local Communities are identified and mitigated.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established the Responsible Sourcing and Modern Slavery Business Practices which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has established the Responsible Sourcing and Modern Slavery Business Practices which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.</p> <p>This audit against the ASI Performance Standard has audited the Entity's Due Diligence practices and as such an additional audit is not required.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity has established the Responsible Sourcing and Modern Slavery Business Practices which discuss Conflict-Affected and High-Risk Areas (CAHRAs) and outlines the use of tools to identify possible high-risk areas and materials, as well as the implementation of the OECD's five-step process. The Entity ensures that risk mitigation measures are taken if any potential high risk issues are identified.</p> <p>The Entity will report on its Due Diligence via its Annual Report. The Entity will also report on its modern slavery activities annually. The Entity's public statement is available via the link:</p> <p><a href="https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance/">https://www.capral.com.au/wordpress/about-capral/general-information/corporate-governance/</a></p>
9.9 Security practice	Not Applicable	This Criterion is not applicable as the Entity does not engage any security personnel at any of its Facilities.

## 10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Freedom of Association and Right to Collective Bargaining are protected by the Fair Work Act (Commonwealth) 2009 in Australia. Each of the Entity's sites has its own enterprise agreement, which is negotiated under section 185 of the Fair Work Act (Commonwealth) 2009. The Electrical Trade Union and the Australian Workers Union are prominent and active unions at the Entity's sites.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable since the Freedom of Association and Right to Collective Bargaining are protected by the Fair Work Act (Commonwealth) 2009 in Australia. Each site has its own enterprise agreement, which is negotiated under section 185 of the Fair Work Act (Commonwealth) 2009.
10.2a-c Child Labour	Conformance	The Entity upholds the Fair Work Act (Commonwealth) 2009 which restricts Child Labour and Capral's Responsible Sourcing and Modern Slavery Policy adheres to the National Employment Standards (NES), which effectively sets 18 years as the minimum age for work, except for apprentices who can start at 16 years but must not engage in physical labour until they reach the age of 18.
10.3a-c Forced Labour	Conformance	The Entity ensures to prevent, mitigate and, where appropriate, remedy modern slavery in their operations and supply chains as stated in their Responsible Sourcing and Modern Slavery Policy. The Entity does not participate in or support Human Trafficking in any form, either directly or through contract labour agencies.  <a href="https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Modern-Slavery-Statement-2021-Approved.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/Capral-Modern-Slavery-Statement-2021-Approved.pdf</a>
10.4a-c Non-Discrimination	Conformance	With its Equal Employer Opportunity Policy and adherence to the Workplace Gender Equality Agency reporting, the Entity provides equal opportunities and prohibits Discrimination in all aspects of employment, including hiring, salary, promotion, training, advancement opportunities, and termination. This policy applies to all employees regardless of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other characteristic that could lead to discrimination.
10.5 Communication and engagement	Conformance	The Entity fosters open communication and direct engagement with its employees and their representatives to address working conditions and resolve workplace and compensation issues. This is undertaken without the threat of reprisal, intimidation, or harassment. The Entity's policies and varied communication channels for grievances and appeals are also made consistently accessible to employees from the time of recruitment.
10.6a-g Violence and Harassment	Conformance	The Entity prohibits the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence. The Entity also has multiple grievance channels and procedures for employees to appeal disciplinary decisions. The Code of Conduct and all Policies are also communicated to all employees including new hires. The Entity's Equal Employment Opportunity, Harassment and Bullying Policy and practices cover all human resources issues, including Violence and Harassment.

CRITERION	RATING	COMMENT
10.7a-c Remuneration	Conformance	The Entity offers its employees competitive salary packages with attractive allowance schemes that are more than sufficient to meet their basic needs. Whether covered by awards or not, all salary packages exceed legal or industry minimum wage standards.
10.8a-c Working Time	Conformance	The Entity ensures that its employees' work hours are in compliance with the federal labour laws and has established procedures for Overtime work. The Entity regularly monitors the total working hours of each employee to ensure compliance with the labour laws in Australia.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that all employees are aware of their rights by upholding the Fair Work Act (Commonwealth) 2009 and Enterprise Bargaining Agreements, and maintaining access to all appropriate channels of communications. All employees have undergone on-boarding training sessions that emphasize their rights and obligations.

## 11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity's Integrated Management System (IMS) Manual and ISO 45001 Occupational Health and Safety (OHS) Management System are effectively documented, controlled, implemented, and communicated to all relevant parties. The systems undergo regular reviews to ensure that they remain suitable and effective, and that necessary resources for adequate implementation have been identified and provided. The Entity has a biannual internal audit of its IMS and is externally audited by a reputable and accredited auditing firm. The Entity has obtained certification for its ISO 45001:2018 OHS Management System.</p> <p><a href="https://www.capral.com.au/wordpress/wp-content/uploads/IMS-CERT.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/IMS-CERT.pdf</a></p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's Integrated Management System Manual and ISO 45001 OHS Management System are effectively documented, controlled, implemented, and communicated to all relevant parties. The systems undergo regular reviews to ensure that they remain suitable and effective, and that necessary resources for adequate implementation have been identified and provided. The Entity has a biannual internal audit of its IMS and is externally audited by a reputable and accredited auditing firm. The Entity has obtained certification for its ISO 45001:2018 OHS Management System.</p> <p><a href="https://www.capral.com.au/wordpress/wp-content/uploads/IMS-CERT.pdf">https://www.capral.com.au/wordpress/wp-content/uploads/IMS-CERT.pdf</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity acknowledges the benefits of engaging its Workers and employees to gather information and insights, discuss to analyse, and collaborate/participate on OHS issues and solutions. Aside from the regular unit, committee, and labour union meetings, all OHS-related training programs sessions for Workers are monitored to comply with the IMS, which includes the Entity's OHS Management System.

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document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 June 2023	Initial Certification Audit – Full Certification

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