# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Speedline Aluminium Gießerei GmbH

#### CERTIFICATE NUMBER

90

### ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

**16 SEPTEMBER 2023** 

DATE OF ISSUE

#### CERTIFICATION LEVEL

DATE OF EXPIRY

PROVISIONAL CERTIFICATION

**15 SEPTEMBER 2024** 

ASI ACCREDITED AUDITING FIRM

### TÜV RHEINLAND CERT GMBH

**CERTIFIED SINCE** 

16 SEPTEMBER 2020

AUTHORISED BY

### **CERTIFICATION SCOPE**

Production of extrusion billets from Recycled Aluminium scrap at the facility in Austria. The Entity is part of Alu-Met GmbH.

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia 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

# AUDIT REPORT PERFORMANCE STANDARD

# **OVERVIEW**

MEMBER NAME	Alu-met GmbH				
ENTITY NAME	Speedline Aluminium Gießerei GmbH				
CERTIFICATION SCOPE	Production of extrusion billets from Recycled Aluminium scrap at the facility in Austria. The Entity is part of Alu-Met GmbH.				
SUPPLY CHAIN ACTIVITIES	<ul><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>				
ASI STANDARD	Performance Standard V3				
AUDIT TYPE	<ul> <li>Initial Certification Audit (23 – 24 June 2020)</li> <li>Surveillance Audit (22 – 23 February 2022)</li> <li>Re-Certification Audit and Scope Change Audit (6 -7 June 2023)</li> </ul>				
AUDIT FIRM	TÜV Rheinland Cert GmbH				
AUDIT DATE	<ul> <li>23 - 24 June 2020 (Initial Certification Audit)</li> <li>22 - 23 February 2022 (Surveillance Audit)</li> <li>6 -7 June 2023 (Re-Certification and Scope Change Audit)</li> </ul>				
AUDIT REPORT SUBMISSION	<ul> <li>5 August 2020 (Initial Certification Audit)</li> <li>9 March 2023 (Surveillance Audit)</li> <li>21 September 2023 (Re-Certification Audit and Scope Change Audit)</li> </ul>				
AUDIT SCOPE	Initial Certification Audit (23 – 24 June 2020)				
	The Audit Scope covered the production of extrusion billets from Recycled Aluminium scrap.				
	Supply chain activities included in the audit scope:				
	<ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>All relevant criteria in the ASI Performance Standard were included in the audit scope.</li> </ul>				
	<u>Surveillance Audit (22 – 23 February 2022)</u>				
	The Audit Scope covered the production of extrusion billets from Recycled Aluminium scrap.				
	Supply chain activities included in the audit scope:				
	<ul> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> <li>All relevant criteria in the ASI Performance Standard were included in the audit scope.</li> </ul>				

	Re-Certification and Scope Change Audit (6 -7 June 2023)			
	The Audit Scope covered the production of extrusion billets from Recycled Aluminium scrap.			
	Supply chain activities included in the audit scope:			
	Aluminium Re-melting/Refining			
	Casthouses			
	All relevant criteria in the ASI Performance Standard were included in the audit scope.			
AUDIT OUTCOME	Provisional 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	16 September 2023 - 15 September 2024			
NEXT AUDIT TYPE	Surveillance Audit			
NEXT AUDIT DATE	31 May 2024			
CERTIFICATE NUMBER	90			
	If you have an inquiry or complaint about this Certification, go to the third-party			



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

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.

### **ENTITY OVERVIEW**

Alu-met GmbH is a company that produces and supplies aluminium extrusion billets. It has two production sites located in Germany and Austria. The total annual capacity of the two plants is 180,000 tonnes of extrusion billets, which are sold into the Central European market. The Speedline aluminium foundry in Austria has a total annual capacity of 96,000 tonnes of alloy (approximately 6,000 extrusion billets) and is known for being one of the most modern and efficient aluminium re-melting plants in Europe. The plant has been continuously optimised since its opening in 2008. There are approximately fifty-four employees on site and the area under management is approximately five hectares. The company is focused on improving capacity, safety standards, and energy efficiency while reducing emissions levels.

### **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
SYSTEMS	Medium	Medium	Low	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL		MED	IUM	

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The General Manager takes overall responsibility for legal compliance. The Entity holds ISO 14001, ISO 45001, and ISO 50001 certification and has implemented systems (e.g., a legal database and qualified legal advisers) to maintain awareness of and ensure Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has issued an Anti-Corruption guideline and communicated it internally and externally (at the parent company's website: <u>https://alu-met.com/standorte</u> ). The risk of Corruption is analysed, evaluated, and periodically reviewed. Employees are made aware of the Code of Conduct and Anti-Corruption guidelines at the time of recruitment.
1.3a-e Code of Conduct	Conformance	The Entity has issued and communicated a 'social standards' document and an Anti-Corruption guideline, including principles relevant to environmental, social and governance performance. The Entity's Workers receive Anti-Corruption training. The documents are available on the parent company's website: <u>https://alu-</u> <u>met.com/standorte</u>
		Metal purchasing is conducted by the parent company Alu-met GmbH, not by the Entity.
2. POLICY AND MANAGEMEN	т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and communicated a Company Policy statement and further Policy documents, addressing environmental, social and governance topics. They are communicated internally and externally. The documents are available at: <u>https://alu- met.com/standorte</u> The Policies are periodically reviewed. Training is provided to Workers
		as applicable.
2.2a-c Leadership	Conformance	The Entity's General Manager has the ultimate responsibility and authority to ensure conformance with the ASI Performance Standard and to ensure sufficient resources to support its implementation. They are supported by the Head of Quality as an ASI representative for Alu- Met Group. Interviews, a site tour and document reviews confirmed that senior management provides the resources needed to fulfil the requirements of the ASI Performance Standard, including training of Workers.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an integrated Management System certified against ISO 14001:2015 and ISO 50001:2018 (as well as ISO 9001 and ISO 45001): <u>https://alu- met.com/downloads</u> There are no outstanding open actions from the latest audit report issued by the certification body.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity is ISO 45001:2018 certified and has implemented an integrated Management System. This includes a focus on human and labour rights.
2.4a-e Responsible Sourcing	Conformance	The Entity's parent company Alu-Met GmbH has implemented a Sourcing Policy "Verantwortungsvolle Beschaffung" (Responsible Sourcing) in German, available at: <u>https://alu-</u> <u>met.com/standorte/#!fancybox/caeb1d84</u> The Entity does not source metal itself as this is carried out by their parent company, which has implemented a process for supply- chain-related risk identification and assessment.
2.5a-g Environmental and Social Impact Assessments	Conformance	The site is located in a highly regulated country (Austria), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process and the Entity has a process in place to manage this. Larger projects or Major Changes to existing Facilities that would have to trigger a social Impact Assessment have not taken place since the Entity joined ASI. The latest project with environmental impact was the installation of a primary melting furnace with heat recovery. Environmental impacts were assessed during the permitting process.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have taken place since the Entity joined ASI. The nature and size of projects and changes to existing Facilities did not require the undertaking of a Human Rights Impact Assessment. However, the Entity has defined criteria for larger projects and Major Changes.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans, in collaboration with relevant Stakeholders such as the local fire brigade. The Entity also holds ISO 14001 and ISO 45001 certifications. As confirmed during the site visit, emergency equipment is in place and employees receive periodic training. Emergency plans are not publicly available, but agencies and relevant Stakeholders have access to them upon request.
2.8a-d Suspended Operations	Conformance	The Entity has established emergency plans and any associated situations where it may have to suspend or significantly alter operations due to factors outside its control. The Entity's management concluded that there was currently no need for action beyond existing measures.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has not undergone or planned Merger or Acquisition (M&A) activity since the Entity joined ASI. Mergers and Acquisitions would be managed by the Entity's parent company Alu-met GmbH, which has a process established to manage M&As, should it become relevant.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity is not the owner of the production Facility but does rent the site from another company of the owner. The closure terms are defined in a rental agreement. Management confirmed that, at the time of the audit, there were plans for closure/decommissioning. The site is located in a highly regulated country (Austria), where relevant projects and changes (including closure and decommissioning) must undergo a thorough analysis and

CRITERION	RATING	COMMENT
		authorisation process and the Alu-met group has systems in place to manage this effectively.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Sustainability Reporting is a part of their parent company Alu-Met GmbH. The Entity's parent company has issued the 2021 Sustainability Report to report on its governance approach and its Material environmental, social, and economic impacts on the audited Entity and its Aluminium Gießerei Nachrodt plant. The Report is based on GRI G4 Criteria. The report is publicly available at: <u>https://alu-met.com/standorte</u>
3.2 Non-compliance and Liabilities	Minor Non- Conformance	The Entity's parent company has publicly disclosed information on fines. As confirmed by the Entity's management, there were no fines or similar paid in the reporting period or within the current year of the ASI Audit. However, it was identified that the public information only addresses environment-related fines, penalties and non-monetary sanctions. See the 2021 Sustainability Report, section 3.8, page 31: <u>https://alu-met.com/standorte</u>
3.3a-c Payments to Governments	Minor Non- Conformance	In its biannual Sustainability Report, the Entity has publicly reported on its governance approach to environmental, social, and economic impacts. However, payments to governments and the value and beneficiaries of financial and in-kind political contributions have not been publicly disclosed. The Entity's management confirmed that no payments were made to
		politicians or political parties prior to and until the time of the audit.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non- Conformance	The Entity has established accessible Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. A dedicated E-Mail address has been established ( <u>help@alu-met.com</u> ), accessible to all Stakeholders. A complaint mailbox has opened the possibility for anonymous Worker complaints. Stakeholders can also reach out to top management directly. The Entity's parent company has provided publicly available information about the Grievance Mechanism.
		However, it was identified the information is not easy to find and access on the website for Stakeholders ( <u>https://alu-</u> <u>met.com/standorte</u> )) (Landing page > Standorte > Beschwerdemanagement)). Internal access to the Entity's database where grievances from Stakeholders are stored does not ensure the confidentiality of the grievances.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its Products and published the data in an Environmental Product Declaration, available at: <u>www.ibu-epd.com</u> and <u>https://www.alu-</u> <u>met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium-</u> <u>Strangpressbolzen.pdf</u>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's Environmental Product Declaration (EPD) (Nr. EPD-ALU- 20200021-IBB1-DE) published by Alu-Met GmbH is available at: https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu- met_Aluminium-Strangpressbolzen.pd
		The EPD contains details of the boundaries, underlying assumptions and data sources.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has developed and implemented processes that allow for the physical separation of different alloys and grades of Aluminium. All scrap is recycled. The effectiveness of these processes was observed during the site tour. As confirmed by interviews, document review and the site tour, the Entity has a program in place to recycle about 100% of its Aluminium Process Scrap, either within its o site, within Alu-Met GmbH, or, in case of Dross with external partners.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity closely co-operates with collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products. As a recycling/remelting operation, the Entity has close contacts with recycling systems, as confirmed by their supplier list.
5. GREENHOUSE GAS EMISSIO	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity does account for, and publicly discloses its Material Greenhouse Gases (GHG) emissions and energy use by source on an annual basis. Greenhouse gas emissions are determined and published in the 2021 Sustainability Report (page 25). Site specific data is provided for Scope 1 and Scope 2 (direct and indirect emissions). The report is available at: <u>https://alu-met.com/downloads</u>
		The Entity has implemented and maintains an Energy Management System according to ISO 50001:2018 which has been certified by an accredited certification body. Specific carbon footprint (cradle- to- gate) is stated in a publicly available Environmental Product Declaration (EPD): <u>https://www.alu-</u> met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alu-met_Aluminium- Strangpressbolzen.pd
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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Minor Non- Conformance	The Entity has defined specific reduction targets as part of its annual environmental/energy program. The program is reviewed on an annual basis internally and by an auditor from an accredited certification body. GHG emissions reduction targets are published in the group's Sustainability Report, page 27: <u>https://alu-</u> <u>met.com/downloads</u>
		In the published Environmental Product Declaration, the specific CO <sub>2</sub> footprint (cradle to gate) is below 2.0/t per tonne Aluminium: <u>https://alu-met.com/downloads/#!fancybox/2e72a894</u> ). However, it was identified the report does not contain information about the Entity's long term GHG Reduction Pathway.
5.4 GHG Emissions Management	Conformance	The Entity has implemented an effective environmental and Energy Management System according to ISO 14001 and ISO 50001 and continuously improves the reduction of emissions and energy use. The certificates are available at: <u>https://alu-met.com/downloads/#Zertifikate</u>
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Minor Non- Conformance	The Entity has published a summary of dust and GHG emissions in Alu-met's Sustainability Report 2021, page 25: <u>https://alu-</u> <u>met.com/downloads</u>
		However, other Material emissions, such as nitrogen oxides (NOx) and sulphur dioxide (SO <sub>2</sub> ) and carbon monoxide (CO) are measured as well, but not yet publicly reported.
6.2a-g Discharges to Water	Minor Non- Conformance	The Entity does not directly discharge effluents into waterways (e.g., creeks or rivers), but rather effluents are treated at the publicly owned wastewater treatment plant and wastewater is analysed daily. The Entity has disclosed their Discharges to Water in its Sustainability Report 2021, page 24: <u>https://alu-met.com/downloads</u>
		However, this report does not contain information on water quality and impacts from discharges.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	In accordance with its certified Environmental Management System according to ISO 14001, the Entity has identified and evaluated risks related to Spills and Leakages, has established management and external communication plans, and compliance controls and has a monitoring programme in place to prevent and detect Spills and Leakages. Emergency plans and equipment are on hand. As no Material Spills and Leakages happened in the reporting period, the Entity did not need to publish a management plan to remediate Spills or Leakages. Further information will be available at the request of relevant Stakeholders.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity reports annually about Spills or releases of harmful substances in their annual Sustainability Report 2021, section 3.7, page 31: <u>https://alu-met.com/downloads</u> . There was no significant release of substances in the 2021 reporting year.
6.5a-c Waste Management and Reporting	Conformance	In accordance with its Environmental Management System according to ISO 14001, the Entity has assessed the impacts related to its waste and has implemented a waste management strategy that is based on the Waste Mitigation Hierarchy. The Entity has publicly disclosed the

CRITERION	RATING	COMMENT
		quantity of its generated waste (hazardous and non-hazardous) in the annual sustainability Report 2021, section 3.6, page 27: <u>https://alu-</u> met.com/downloads
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	Conformance	The quantity of generated Dross is a key performance indicator for the Entity, and is recorded for each batch. The Entity collects all recovered Dross and stores it in a designated area before it is shipped to an external recycling Facility. The Dross is not landfilled. Residues from the Dross recycling (Salt Slag) is recycled by another recycler.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has assessed water-related risks in Watersheds which is supported by an assessment undertaken by an external independent expert. The evaluations did not identify significant risks. Data on water usage are publicly available in the annual Sustainability Report 2021, section 3.4, page 24: https://alu-met.com/downloads
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the water-related risk assessment was rated as low.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has engaged an external consultancy firm to assess the risk to, and potential impacts on biodiversity and Ecosystem Services resulting from the land use and activities within the Entity's Area of Influence. A report was developed and although major risks have not been identified, a biodiversity action plan has been established.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's biodiversity assessment rated the risks to Ecosystem Services as low.
8.2a-g Biodiversity Management	Conformance	The Entity has conducted a biodiversity assessment which identified no major impacts. However, a biodiversity action plan has been endorsed and funded by management and its implementation is ongoing. Implemented measures from the action plan are publicly available at: https://alu-met.com/standorte/#!fancybox/f59596fc
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as due to the size and nature of the business as an Aluminium re-melter and that no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity works to prevent and mitigate the introduction of Alien Species. During the Entity's thermal processing of the Aluminium scrap, all species contained in the scrap are destroyed. As a measure to protect their site and the surrounding area against neophytes (which

CRITERION	RATING	COMMENT
		may be brought in by vehicles), the factory area is cleaned of neophytes annually.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located in or near World Heritage Properties, as confirmed by the site visit and the UNESCO World Heritage Map (see <u>https://whc.unesco.org/en/statesparties</u> ). The Entity has implemented a process to ensure that New Projects are not explored or developed in World Heritage Properties.
8.6a-d Protected Areas	Conformance	Protected Areas in the vicinity of the site include a meadow area known as "Streuwiesenbiotopverbund Rheintal - Walgau". Other notable biotopes in the vicinity (500 - 1000m) include the alluvial forests and the moor grass meadows on the river III in the southeast, as well as rough meadows in the northeast. For more information see: http://apps.vorarlberg.at/archiv/umweltschutz/biotopinventar/Schlins. pdf and https://atlas.vorarlberg.at/portal/map/Natur and https://vorarlberg.at/-/biotopinventar-vorarlberg).
		The Entity's impact on these areas has been assessed in a biodiversity study which did not identify any Material impact on these Protected Areas and biotopes.
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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity's parent company Alu-met has issued a company Policy and a 'social standards' document, expressing a commitment to respect Human Rights. Both documents apply to the Entity in full. The Documents are available at: <u>https://alu-met.com/standorte</u>
		The Entity has conducted a documented Human Rights Due Diligence assessment. The assessment did not identify any salient issues with regard to Human Rights, which was confirmed by interviews at the audit.
9.2a-e Gender Equity and Women's Empowerment	Minor Non- Conformance	Women's rights are addressed in the Code of Conduct. The Code has been communicated to all employees and is available at <u>https://alu-met.com/standorte</u>
		However, it was identified the Entity has not yet established a formal program to promote gender equity.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present where they operate.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present where they operate.

CRITERION	RATING	COMMENT
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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present where they operate.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has assessed sacred or cultural heritage sites and values within its Area of Influence. One site was identified. Vorarlberg, the administrative region where the site is situated, does not have incorporate any World Heritage sites. However, the "Bregenzerwald" region, which is the nearest relevant site, has been included in the list of World Heritage candidate sites since 1994.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present where they operate.
9.6a-i Displacement	Not Applicable	This Criterion does not apply to the Entity, as no resettlements have taken place during the period since joining ASI, nor are expected to occur during the Certification Period.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has conducted a Human Rights Due Diligence assessment to assess whether the rights and interests of Affected Populations and Organisations are respected regarding their lands, livelihoods, and use of natural resources. The outcome of this assessment has confirmed that there are no issues or concerns relevant to the Local Community, and therefore there is no need for action. Stakeholder interviews confirmed that the Entity has a sound relationship with the local community.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Aluminium (primary and scrap material) is sourced by the Entity's parent company Alu-met GmbH, not by the Entity. The parent company has implemented a process for risk-based Due Diligence for its Aluminium supply chain which includes systematic identification and assessment of risks in the supply chain. Responsibility for supply chain Due Diligence is assigned within Alu-met.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Major Non- Conformance	The Entity's parent company Alu-met GmbH has implemented a process for risk-based Due Diligence for its Aluminium supply chain which includes systematic identification and assessment of risks in the supply chain. However, only Aluminium scrap is covered by the risk assessment process, not the suppliers of Primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's parent company Alu-met GmbH has implemented a process for risk-based Due Diligence for its Aluminium supply chain which includes systematic identification and assessment of risks in the supply chain. A strategy to respond to identified risks is established by the parent company Alu-met.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Performance Standard Re-Certification Audit in June 2023 fulfilled the requirement of this Criterion.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Major Non- Conformance	Aluminium (primary and scrap material) is sourced by the Entity's parent company Alu-met GmbH, not by the Entity. However, the Entity did not report publicly about the process and results of their supply chain Due Diligence. See their website ( <u>https://alu-met.com/downloads</u> ).
9.9 Security practice	Not Applicable	This Criterion is not applicable, as the Entity does not employ security staff at their site.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to unite freely in unions and seek representation without interference even though there is no elected worker representation in place at the site level. As confirmed by interviews with Workers and management, the Entity takes an open attitude towards the election of a works council. The Entity also respects the rights of Workers to Collective Bargaining. The Entity is a member of the employers' industry association (Wirtschaftskammer) and have negotiated Collective Bargaining agreements with the union and Workers association (Arbeiterkammer) at the national industry branch level.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion does not apply to the Entity, Applicable Law allows for the right to Freedom of Association and Collective Bargaining in Austria.
10.2a Child Labour	Conformance	As confirmed by interviews with Workers and management, the Entity does not employ minors under the age of 15 years. The Entity has implemented practices to ensure that children are not employed. The youngest worker employed was over 18 years old at the time of the audit. The 'social standards' document, issued by Alu-met, addresses the prohibition of Child Labour, available at: <u>https://alu-met.com/standorte</u>
10.3a-c Forced Labour	Minor Non- Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not engage in, nor support Human Trafficking, either directly, or through any employment or recruitment agencies. This was confirmed via a site observation, interviews with Workers and management as well document review. The Entity's Social Standards (Sozialstandards) Policy, addresses the prohibition of Forced Labour, available at: <u>https://alu-met.com/standorte</u> However, it was identified the Entity has disclosed a Modern Slavery Statement.
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Social Standards (Sozialstandards) Policy. The Entity's risk assessment addressed Discrimination and there is no Discrimination in pay for equal work. As confirmed by interviews there is no Discrimination in pay for equal work. The Entity also does not engage in, nor support Discrimination.
10.5 Communication and engagement	Conformance	As confirmed by interviews and a Document review, the Entity ensures open communication and direct engagement with Workers.

CRITERION	RATING	COMMENT		
		Nominated Workers function as safety representatives (Sicherheitsvertauenspersonen), a joint Health and Safety committee is established, and an anonymous letter box for raising suggestions or concerns is available. Workers meet daily with their superiors to discuss work related issues. Due to the small number of Workers, the Entity practices an 'open door policy' rather than institutionalised systems for employee engagement.		
10.6a-g Violence and Harassment	Minor Non- Conformance	As confirmed by interviews and a document review, the Entity does neither engage in, nor tolerate the use of inadequate and unacceptable treatment of Workers. However, it was identified the publicly available Policy states management's commitment to respect Human Rights, but it is not specific with regard to Violence and Harassment. The commitment is available at: https://alu-met.com/standorte		
10.7a-c Remuneration	Conformance	The Entity respects the rights of Workers to receive a living wage and ensures that wages paid for a normal working week meet the industry standard. This was confirmed via document review and worker interviews. Remuneration is provided according to the industry-wide Collective Bargaining agreement and is always above the national minimum wage. Wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employees' bank accounts and pay slips are provided to employees, which are detailed and legible. Overtime is paid with a premium of at least 25%.		
10.8a-c Working Time	Conformance	The Entity follows Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is regulated in the branch Collective Bargaining agreement and is incorporated in each employment contract. A 'clocking-in' system is in place and records are available. Overtime is voluntary and due to the shift system; it is quite limited. The average Working Time of production is 40 hours/week.		
10.9a-b Informing Workers of Rights	Conformance	As confirmed through interviews and document review, Workers receive training regarding Occupational Health and Safety but also about ASI principles and labour law during induction training and through annual refresher training. All employees can also contact the Chamber of Labor ("Arbeiterkammer") for information and advice.		
11. OCCUPATIONAL HEALTH AND SAFETY				
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated it is Occupational Health and Safety (OH&S) Policy.		
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Major Non- Conformance	The Entity is ISO 45001 certified, and the effectiveness of its OH&S Management System is reviewed on an annual basis. Leading and lagging OH&S performance indicators are regularly monitored. However, it was identified the Entity's OH&S performance indicators are not publicly available and consequently, a comparative analysis of the performance with peer business has not been published.		
11.2 Employee engagement on Health and Safety	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. In line with national law, a Health and Safety committee has been established, in which Workers and safety specialists participate.		

CRITERION	RATING	COMMENT
		All Workers can issue 'safety notices' to inform management about perceived safety issues.

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	16 September 2020	Issued (Initial Certification)
1	19 May 2023	Surveillance Audit
2	8 November 2023	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.