

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUCAM Aluminium Plant

CERTIFICATE NUMBER
388

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
CERTAINABLE GMBH

DATE OF ISSUE
12 AUGUST 2024

DATE OF EXPIRY
11 AUGUST 2027

CERTIFIED SINCE
12 AUGUST 2024

AUTHORISED BY

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

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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

Primary Aluminum smelting from Alumina includes the production of green anodes at the paste plant, anode baking and rodding, casting of Aluminum ingots and slabs, rolling of slabs, and coating of coils at the Alucam Plant in Edea, Cameroon. The management of industrial waste at the landfill in Sikoum, and the handling of coke, pitch, and Alumina at the seaport and logistics site in Douala, Cameroon.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALUCAM
ENTITY NAME	ALUCAM Aluminium Plant
CERTIFICATION SCOPE	Primary Aluminum smelting from alumina includes the production of green anodes at the paste plant, anode baking and rodding, casting of Aluminum ingots and slabs, rolling of slabs, and coating of coils at the Alucam Plant in Edea, Cameroon. The management of industrial waste at the landfill in Sikoum, and the handling of coke, pitch, and alumina at the seaport and logistics site in Douala, Cameroon.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Certainable GmbH
AUDIT DATE	<ul style="list-style-type: none">22 – 26 April 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">22 July 2024
AUDIT SCOPE	<p>The Audit Scope covered the electrolysis, Casting, rolling, and coating activities of its plant in Edea, Cameroon, as well as the seaport, logistics site, headquarters and waste yard.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina SmeltingCasthousesSemi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> 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.

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- 📄 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 12 August 2024 – 11 August 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 12 August 2026

CERTIFICATE NUMBER 388



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.

ENTITY OVERVIEW

ALUCAM (the 'Entity') is the Aluminium Company of Cameroon, was founded in 1954 and began production in 1957 with a capacity of 55,000 tonnes per annum. In 1981, the production capacity increased to 100,000 tonnes per year after an extension of the potline. ALUCAM is a major regional employer with approximately 800 Workers.

The main activities of the Entity include Aluminium smelting, Aluminium casting, rolling and coating of Aluminium coils. The Entity's operations cover a total surface area of approximately 21 hectares (ha), comprising a smelter, a Casthouse, a rolling mill and a coating line in Edea. There's also an industrial waste landfill in Sikoum (11 km away from the Edea Plant), a logistics Site in Douala for raw material (coke, pitch, alumina) supply and product exportation, along with a small warehouse.

Other ancillary infrastructure includes a substation for energy conditioning for the potline, a hospital for occupational health coverage and accommodation for Workers located near the Smelter. The nearest sensitive receptor is the Sanaga River. The state of Cameroon is the majority shareholder currently, with the remainder of ownership divided between the French Development Agency and the Entity's employees. For more detailed insights into the Entity's business activities, refer to www.alucam.cm

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	High	High	Medium	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity demonstrates robust legal Compliance through regular audits and updates, ensuring compliance with relevant regulations.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. Its Code of Business Conduct covering Corruption is publicly available at: https://alucam.cm/wp-content/uploads/2024/04/Code-de-Conduite-des-Affaires_ALUCAM-2024.pdf</p> <p>The Entity established multiple anti-Corruption measures, such as Policies, training, Due Diligence checks, and a whistleblowing line endorsed by senior management. Affected employees received anti-Corruption training.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has issued and made publicly available its Code of Business Conduct: https://alucam.cm/wp-content/uploads/2024/04/Code-de-Conduite-des-Affaires_ALUCAM-2024.pdf</p> <p>The Code includes principles relevant to environmental, social and governance performance. The Entity runs a regular training program for employees.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains Policies consistent with the environmental, social and governance practices. They are made publicly available at: https://alucam.cm/wp-content/uploads/2024/04/Politique-de-Management-2024.pdf</p> <p>The Entity has trained its employees to make them aware of these Policies. The Policies have been formally endorsed by senior management.</p>
2.2a-c Leadership	Conformance	The Entity has established an ASI Steering Committee and appoints Champions to ensure Compliance. This process is led by the Plant Manager, who acts as the primary ASI Contact. An ASI Steering Committee has been established to address all ASI-related matters under the oversight of senior management.
2.3a Environmental and Social Management Systems - Environmental	Conformance	An integrated Management System has been implemented and developed in accordance with ISO 9001, ISO 14001 and ISO 45001. The most recent audit reports were reviewed as part of this audit. All follow-up actions are being monitored effectively.
2.3b Environmental and Social Management Systems - Social	Conformance	As confirmed by document review and interviews with Workers and management, the Entity has implemented and maintains an effective Environmental and Social Management System including Human Rights, Labour rights and Occupational Health And Safety. The Management Systems have been directed by the key findings in the most recent Environmental and Social Impact Assessment.
2.4a-e Responsible Sourcing	Conformance	The Entity has a system and practices for responsible sourcing. The Entity's Responsible Purchasing and Supply Code addresses environmental, social and governance issues. The Code will be

CRITERION	RATING	COMMENT
		regularly reviewed and is available at: https://alucam.cm/wp-content/uploads/2024/04/CODE-ACHATS-ET-APPRO-RESPONSABLES-ALUCAM-2024.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.</p> <p>However, despite the absence of any major projects since the Entity joined ASI as a Member, the Entity has updated the Environmental and Social Impact Assessment. The Ministry of Environment has approved the Environmental and Social Management Plan (ESMP Report).</p> <p>The six-monthly ESMP report summarises and plans the implementation of environmental and social measures arising from the most recent Environmental and Social Impact Assessment. The latest ESMP-Report is available at: https://alucam.cm/wp-content/uploads/2024/04/Rapport-PGES_1er_Sem_2023_VC.pdf</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities.</p> <p>However, despite the absence of any major projects since the Entity joined ASI as a Member, they have updated the Environmental and Social Impact Assessment. The Ministry of Environment has approved the Environmental and Social Management Plan (ESMP Report).</p> <p>The six-monthly ESMP report summarises and plans the implementation of environmental and social measures arising from the most recent Environmental and Social Impact Assessment. The latest ESMP-Report is available at: https://alucam.cm/wp-content/uploads/2024/04/Rapport-PGES_1er_Sem_2023_VC.pdf</p>
2.7a-f Emergency Response Plan	Conformance	The Entity strengthens emergency management with regular reviews and comprehensive plans for the plant and port. Emergency procedures and plans are available at: https://alucam.cm/rse/systeme-de-management/procedures
2.8a-d Suspended Operations	Conformance	The Entity strengthens business continuity with a comprehensive resilience plan to minimise adverse environmental, social and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has implemented comprehensive measures to mitigate environmental, social, and governance impacts following the merger with Socatral.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a Closure, Decommissioning, and Divestment procedure. The Entity has developed comprehensive rehabilitation projects for a former landfill with stakeholder integration and annual review.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published a Sustainability Report, demonstrating commitment to environmental, social, and economic issues, and is available at: https://alucam.cm/wp-content/uploads/2024/04/2024_03_29-Rapport-de-Developpement-Durable-ALUCAM.pdf

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	The Entity confirms their legal Compliance and that there are no Material sanctions reported in the Sustainability Report: https://alucam.cm/rse/rapport-de-developpement-durable
3.3a-c Payments to Governments	Conformance	The Entity has implemented strict transparency and anti-Corruption measures, and publicly discloses all payments and political contributions annually in the Sustainability Report, page 16: https://alucam.cm/rse/rapport-de-developpement-durable
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a Grievance Mechanism. The Grievance Mechanism Standard Operating Procedure is made available to the public domain via two approaches, via the webpage, and through physical distribution and training for traditional groups. The management of customer's complaints, requests for information and complaints from interest parties: https://alucam.cm/wp-content/uploads/2024/03/HSE-PRO-09-004_Traitement-de-s-reclamations-clients-demands-dinformations-et-plainte-s-des-parties-interessees.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a comprehensive Life Cycle Analysis (LCA) for all major Products, utilising International Aluminium Institute (IAI) Data and following ISO 14040:2006 Standards.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	A Life Cycle Assessment (LCA) according to ISO 14040:2006 has been completed for their ingot products: Life Cycle Analysis Of Aluminium Products Alucam 2024: https://alucam.cm/wp-content/uploads/2024/06/Analyse-cycle-de-vie-de-laluminium_Alucam-2024.pdf Life Cycle of Alucam Products: https://alucam.cm/wp-content/uploads/2024/06/Synthese-cycle-de-vie-lingots-en-aluminium-Alucam_vf.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable, as the Entity only fabricates and commercialises primary metal in the forms of ingots, slabs, coils and sheets.
4.3a-b Aluminium Process Scrap	Conformance	Almost 100 % of internal scrap is recycled. The Entity has a Scrap Management System and several Projects for optimising Scrap recovery are in place.
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 enhances engagement in local recycling initiatives and similar initiatives, aiming to improve Aluminium scrap management in Cameroon. There are challenges and opportunities in Aluminium scrap recycling, with small-scale recyclers playing a crucial role despite infrastructure and technology gaps.

CRITERION	RATING	COMMENT
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Scope 1, 2 and 3 Greenhouse Gases (GHG) Emissions and energy use Data are verified and are publicly available at: https://alucam.cm/wp-content/uploads/2024/04/20240418-Profil-de-reduction-du-CO2-coherent-avec-les-objectifs-rechauffement-climatique-1.5C_Diffusion.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable, as the Smelter started production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	<p>The Entity has demonstrated that GHG emissions from mine to metal are either below 11.0t/t Al or have been reduced by at least 10% over the past three reporting periods. When comparing the average emissions per ton of Aluminum from the previous three reporting periods (which was 12,946 kg of emissions per ton of Aluminum) to the emissions average for 2024 (which is 9,882 kg per ton of Aluminum), there has been a reduction of 31%.</p> <p>The Entity has also established plans to reduce GHG emissions, ensuring that the emission intensity from mine to metal will be below 13.0t CO₂ eq/tAl by 2025 and less than 11.0t CO₂ eq/tAl by 2030. The results show a large variability across the years, mainly linked to well-identified causes that are under control.</p> <p>In 2023, the CO₂ emissions for the Entity's electrolysis process (Scope 1) were calculated as 11.95 tCO₂e/tAl, with various projects aimed at further reducing CO₂ emissions.</p> <p>More information is available at: https://alucam.cm/wp-content/uploads/2024/04/20240418-Profil-de-reduction-du-CO2-coherent-avec-les-objectifs-rechauffement-climatique-1.5C_Diffusion.pdf</p>
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity strengthens energy efficiency and management with strategic projects and continuous improvement. The Entity has launched various projects aimed at improving energy efficiency. These include upgrading equipment, optimising processes, and leveraging new technologies to reduce energy consumption.</p> <p>More information is available at: https://alucam.cm/wp-content/uploads/2024/04/20240418-Profil-de-reduction-du-CO2-coherent-avec-les-objectifs-rechauffement-climatique-1.5C_Diffusion.pdf</p>
5.4 GHG Emissions Management	Conformance	The Entity meets all requirements for GHG Emissions Management, implementing comprehensive systems aligned with ISO (e.g. ISO 14001) and internal standards. Energy consumption is tracked systematically, and energy efficiency projects are regularly initiated and reviewed.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has implemented a comprehensive air quality management plan that ensures regular checks for compliance with emission thresholds set by Applicable Laws and the monitoring of their impacts. The Entity has no Material Emissions to Air. The proper functioning of their management system is periodically verified

CRITERION	RATING	COMMENT
		<p>through internal reviews, external inspections, and reporting to competent administrations.</p> <p>More information is available in the Implementation report of the Environment and Social Management Plan, page 26: https://alucam.cm/wp-content/uploads/2024/04/Rapport-PGES_2e_Sem_2023_VFofficielle.pdf</p> <p>For more detailed information on Emissions to Air, please refer to the Sustainability Report, pages 28-32: https://alucam.cm/rse/rapport-de-developpement-durable</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity ensures a comprehensive water management and compliance plan with regular laboratory analyses and continuous improvement initiatives. All discharges from the Entity are within permitted limits.</p> <p>Refer to the Sustainable Development Report March 2024, pages 33-38: https://alucam.cm/rse/rapport-de-developpement-durable</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has ensured stringent control of hazardous substances and contamination, with regular audits and comprehensive training programs.</p> <p>Sustainable Development Report March 2024, page 21: https://alucam.cm/rse/rapport-de-developpement-durable</p> <p>Implementation Report of the Environment and Social Management Plan: https://alucam.cm/wp-content/uploads/2024/04/Rapport-PGES_1er_Sem_2023_VC.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity ensures stringent control of hazardous substances and contamination, with regular audits, comprehensive training programs, and transparent public disclosure. There have been no recent significant cases of Spills or Leakages.</p> <p>Sustainable Development Report March 2024, page 21: https://alucam.cm/rse/rapport-de-developpement-durable</p> <p>Implementation Report of the Environment and Social Management Plan: https://alucam.cm/wp-content/uploads/2024/04/Rapport-PGES_1er_Sem_2023_VC.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity publicly Discloses Waste Quantities and Impacts, Implementing a Comprehensive Waste Management Strategy Aligned with the Waste Mitigation Hierarchy.</p> <p>Sustainable Development Report March 2024, pages 39-40: https://alucam.cm/rse/rapport-de-developpement-durable</p>
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)	Conformance	<p>The Entity has constructed a standard industrial landfill (CSDU) for the treatment and elimination of industrial waste. The landfill is used for disposing of first cut Spent Pot Lining (SPL), second cut SPL, Scrap metal, alumina sweepings, refractory bricks, sludge from the treatment of leachate, and other sweepings when they cannot be reabsorbed into the production process.</p> <p>There are established processes for managing Spent Pot Lining (SPL), ensuring that it is stored and managed to prevent its release or</p>

CRITERION	RATING	COMMENT
		<p>leaching into the environment while implementing comprehensive waste reduction strategies. Leachate from the landfill is collected and transported to a treatment unit. Untreated SPL is not landfilled where there is the potential for adverse environmental effects.</p> <p>Sustainable Development Report March 2024, pages 39-40: https://alucam.cm/wp-content/uploads/2024/04/2024_03_29-Rapport-de-Developpement-Durable-ALUCAM.pdf</p>
6.8a-d Dross	Conformance	<p>The Entity has implemented a Dross management strategy to enhance Aluminum recovery and recycling. As part of a broader waste reduction plan, the strategy focuses on minimising Dross generation at the source and using storage methods to prevent the release of leachate into the environment. Dross is recovered and recycled appropriately. An alternative to landfilling dross is underway, and a contract has been signed to start on-site Dross recycling by January 2025.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity quantifies and publicly discloses its water withdrawal and use annually, along with associated risks in Watersheds. The industrial area of the site is located in the Sanaga River Watershed and is classified as low risk for water scarcity, flooding, and water quality issues.</p> <p>Sustainable Development Report March 2024, pages 33-38: https://alucam.cm/rse/rapport-de-developpement-durable</p>
7.2a-e Water Management	Conformance	<p>The Entity has implemented comprehensive water management measures, publicly disclosed usage and risks, and established strategic goals for reduction and awareness.</p> <p>Sustainable Development Report March 2024, pages 33-38: https://alucam.cm/rse/rapport-de-developpement-durable</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has implemented comprehensive Biodiversity protection measures with regular environmental assessments, which have shown positive results in reducing fluoride emissions and enhancing the local ecosystem. The Entity's impact on Biodiversity is deemed to be low.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk to, and impacts on Biodiversity and Ecosystem Services is deemed to be low. However, the Entity conducts ongoing Biodiversity monitoring and has implemented measures to mitigate any negative impacts on the local ecosystem.</p>
8.2a-g Biodiversity Management	Not Applicable	<p>This Criterion is not applicable when the risks and potential impacts identified are assessed and documented as low.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>This Criterion is not applicable when no Priority Ecosystem Services are identified.</p>

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity has assessed the risk of Alien Species and established a procedure to manage mitigation actions. In this context, the Entity has launched a program together with the energy provider to reduce the spread of flying insects near hydropower dams.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has issued a statement in their Code of Business Conduct stating that activities in World Heritage Properties are prohibited. This ensures that the Entity acknowledges and respects the importance and protection of these unique and valuable sites. Code of Conduct: https://alucam.cm/wp-content/uploads/2024/04/Code-de-Conduite-des-Affaires_ALUCAM-2024.pdf
8.6a-d Protected Areas	Conformance	The headquarters and smelting sites of the Entity are not directly located within Protected Areas of significant Biodiversity. The sites are near Protected Areas, however, the Entity has implemented measures to minimise any potential adverse impacts on these areas. The Entity has conducted assessments and uses comprehensive environmental strategies and regular reviews to ensure that nearby marine and forest Protected Areas are not adversely affected. The Biodiversity general map for 2024 and the analysis of surrounding Biodiversity are available at: https://alucam.cm/rse/biodiversite
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	Minor Non-Conformance	The Entity has issued and communicated its Code of Business Conduct and Human Rights Policy, which includes a commitment to respect Human Rights. The Policy is available at: https://alucam.cm/rse/droits-de-lhomme Code of Business Conduct: https://alucam.cm/wp-content/uploads/2024/04/Code-de-Conduite-des-Affaires_ALUCAM-2024.pdf The Entity has conducted a Human Rights Due Diligence (HRDD) assessment with internal and external Stakeholders. However, the HRDD is limited to the Certification Scope only and does not include the Area of Influence to its full extent. Furthermore, the proactive consultation with Affected Populations and Organisations could be improved.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has demonstrated that it works to promote gender equity and women's empowerment at work. A program to promote gender equity and women's empowerment has been established and is published at: https://alucam.cm/wp-content/uploads/2024/07/Declaration-de-politique-sur-legalite-des-chances_ALUCAM.pdf Public disclosure of the effectiveness of the measures taken to promote gender equity annually is through the in-house magazine 'Limelight'. The latest publication on the effectiveness of the gender

CRITERION	RATING	COMMENT
		equity program is available at: https://alucam.cm/wp-content/uploads/2023/02/Limelight-N°41_Janvier-2023.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by their operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by their operations.
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 to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by their operations.
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity has developed a communication mechanism with neighbouring population groups and Non-Governmental Organisations (NGOs). No cultural and sacred heritage sites were identified within the Area of Influence.</p> <p>However, an identification process has been developed to respond early to changes in the Entity's business and activities, and to involve the local population in the decision-making process.</p>
9.5b Cultural and Sacred Heritage - Impacts	Conformance	<p>The Entity has developed a communication mechanism with neighbouring population groups and NGOs. No cultural and sacred heritage was identified within the Area of Influence.</p> <p>However, an identification process has been developed to respond early to changes in the Entity's business and activities, and to involve the local population in the decision-making process.</p>
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have not been any New Projects or major changes that required the displacement of people since the Entity joined ASI. This was confirmed through internal and external interviews undertaken during the Audit.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	The Entity has implemented a mechanism to engage with the community. There are various measures in place to engage with the community and to respect and support their livelihoods. However, during community interviews it was learned that some community members are concerned over a lack of communication from the Entity. Furthermore, the latest community action plan has not yet been published.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a robust Management System to avoid involvement in any armed conflict or Human Rights abuses, and includes a clear Policy documented in its Code of Business Conduct. The Management System has been established in accordance with the OECD Guidance.

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a robust risk assessment to identify and assess armed conflicts and Human Rights abuses within the supply chain. The Risk Assessment is specifically associated with the downstream value chain by considering the Alumina refinery and the associated mines. Transparency is provided on mining operations as well as to the loading ports. The Bauxite mines are located in Guinea, Brazil and Australia.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a robust risk assessment to identify and assess armed conflicts and Human Rights abuses within the supply chain. The Risk Assessment is specifically associated with the downstream value chain by considering the Alumina refinery and the associated mines. Transparency is provided on mining operations as well as to the loading ports. Furthermore, a strategy and action plan to answer to identified risks have been established.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has prepared itself to undergo a third-party audit of its Due Diligence practices. The ASI audit report provides evidence of the Audit of Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established a robust risk assessment to identify and assess armed conflicts and Human Rights abuses within the supply chain. The risk assessment is specifically associated with the downstream value chain by considering the Alumina refinery and the associated mines. Transparency is provided on mining operations as well as to the loading ports. The Bauxite mines are located in Guinea, Brazil and Australia. Furthermore, a strategy and action plan to respond to identified risks have been established. However, the Entity does not annually report its performance publicly on supply chain Due Diligence.
9.9 Security practice	Conformance	Interviews and 'shop floor' visits confirmed that Security personnel are not armed, and no complaints against security agents have been received. The security provider respects Human Rights in line with recognised standards and good practices.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	Interviews with Workers and their representatives confirmed that the Entity respects the rights of Workers to unite freely, seek representation and join the Works Councils without interference. The site has a freely elected Worker representative and abides by collective agreements bargained with the Unions.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as Freedom Of Association and Collective Bargaining is not restricted in Cameroon.
10.2a Child Labour	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 18 years is respected. The youngest Worker on site was 21 years old at the time of the audit, as confirmed by interviews and the employee roster.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does neither engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews with Workers and management as well as a document review. In the Entity's Code of Business Conduct, it is stated that it does not tolerate any form of Human Trafficking or Child Labour and are fundamentally opposed to any type of forced or compulsory labour.</p> <p>However, the Entity has not yet published an annual Modern Slavery Statement detailing their actions to address Modern Slavery.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is committed to non-Discrimination and communicates this commitment in its Code of Business Conduct: https://alucam.cm/wp-content/uploads/2024/04/Code-de-Conduite-des-Affaires_ALUCAM-2024.pdf</p> <p>The Code has been made available to Workers. Workers have been trained in the values stated in the Code of Business Conduct. As confirmed by interviews and document review, the Entity does not engage in or support Discrimination.</p>
10.5 Communication and engagement	Conformance	<p>Workers, worker representatives and management confirmed that the Entity communicates appropriately and co-operates in good faith with Workers and their representatives on work-related issues. Works Council members and management meet regularly. Feedback received from employee interviews undertaken for this Audit was that the Workers feel valued by their management.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity is committed to a respectful working environment and has prohibited any form of Harassment or pressure in the workplace, nor do they tolerate Discrimination or corporal punishment (see Workplace Policy "Charte de non harcèlement moral et sexuel"): https://alucam.cm/wp-content/uploads/2024/07/Charte-de-Non-Harcèlement-Moral-et-Sexuel_ALUCAM-2024.pdf</p> <p>The Policy has been communicated and Workers receive related training. The Policy is regularly reviewed. As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers.</p>
10.7a-c Remuneration	Conformance	<p>The Entity fulfils the requirements of this Criterion in full, as confirmed by interviews and document review. Wages meet the industry standard and are well above the National legal minimum. Supporting evidence, such as work contracts, pay slips and Collective Bargaining agreements were readily at hand.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity complies with relevant laws and collective agreements regarding Working Time, public holidays, and annual leave, as confirmed by interviews and document review. These provisions are in place to ensure that Workers have adequate time off and that the length of workdays complies with the law and industry standards.</p> <p>However, during the Audit, the Entity was unable to provide evidence that the average workday is 8 hours over a six-month period. As a result, measures have been initiated to improve visibility on this matter.</p>

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	Interviews with Workers and management confirmed that Workers are informed about their rights. In every employment contract, there is a reference to the most relevant legal codes as well as the collective agreement provisions. Every employee has the opportunity to obtain necessary information via staff representatives.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	The Entity has implemented a comprehensive HSEQ Management System with regular Audits and annual reports to ensure conformance and mitigate risks. ISO Certificates are available at: https://alucam.cm/rse/systeme-de-management/certifications However, pedestrian safety risks on site were identified during the Audit.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	Worker engagement at the Entity strengthens Health and Safety measures through active participation and regular Consultation. KPIs (leading and lagging) showing high performance, pages 17-26: https://alucam.cm/wp-content/uploads/2024/07/2024_03_29-Rapport-de-Developpement-Durable-ALUCAM.pdf The Entity's Health, Safety and Working Conditions Committee has scheduled benchmark visits with other organisations to enhance their safety standards. Refer to the OH&S Committee's benchmark request for more details: https://alucam.cm/wp-content/uploads/2024/08/Demande-de-visite-de-benchmark-CHSCT.pdf Health, Safety, Environment, and Quality Review: https://alucam.cm/wp-content/uploads/2024/08/Reunion-CHSCT-Electrolyse_Juin-2024.pdf
11.2 Employee engagement on Health and Safety	Conformance	Worker engagement at the Entity strengthens Health and Safety measures through active participation and regular consultations. The Entity has established a Health and Safety Committee with accompanying procedures governing internal/external communication and consultation with Workers in Health and Safety.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 August 2024	Initial Certification Audit - Full Certification