
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**ALUMINIUM GmbH
NACHRODT**

CERTIFICATE
NUMBER

107

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

5 JANUARY 2022

DATE OF EXPIRY

4 JANUARY 2025

CERTIFIED SINCE

5 JANUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.' followed by a long horizontal stroke.

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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

Production of extrusion billets from recycled
Aluminium Scrap at Aluminium GmbH Nachrodt,
Germany.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alu-Met GmbH (Austria)
ENTITY NAME	Aluminium GmbH Nachrodt
CERTIFICATION SCOPE	Production of extrusion billets from recycled Aluminium Scrap at Aluminium GmbH Nachrodt, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (9 – 11 November 2020)Surveillance Audit (10 – 11 May 2021)Surveillance Audit (29 October 2021)Surveillance Audit (3 July 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">9 – 11 November 2020 (Initial Certification Audit)10 – 11 May 2021 (Surveillance Audit)29 October 2021 (Surveillance Audit)3 July 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2020 (Initial Certification Audit)14 June 2021 (Surveillance Audit)9 February 2022 (Surveillance Audit)11 November 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 11 November 2020)</u></p> <p>Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses

All relevant Criteria in the ASI Performance Standard were included in the audit scope.

At the time of the Audit (November 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (10 – 11 May 2021)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

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.

At the time of the Audit (May 2021), access to the site was limited, due to COVID-19 related travel restrictions. The audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and on-site observations for relevant criteria.

Surveillance Audit (29 October 2021)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

Criteria in the ASI Performance Standard that were identified as non-conformities from the previous surveillance Audit were included in the audit scope.

The Audit has been undertaken as a 'desktop' exercise consistent with the Entity's overall maturity level and the audit type.

Surveillance Audit (3 July 2023)

Production of extrusion billets from recycled Aluminium Scrap at the Scrap Remelting / Casthouse of Aluminium GmbH Nachrodt (Germany).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

The Audit Scope was limited to specific criteria in the ASI Performance Standard that were identified as non-conformities (or related to) from the previous surveillance Audit.

AUDIT
OUTCOME

- Certification
-

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

5 January 2022 – 4 January 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

4 January 2025

CERTIFICATE
NUMBER

107

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to legal compliance requirements. The General Manager takes overall responsibility for legal compliance. There are systems in place (e.g. a legal database and qualified legal advisers) to maintain awareness of and to ensure compliance with Applicable Law. The Entity holds ISO 14001 and ISO 50001 certificates from an accredited certification body to ensure compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	<p>The Entity has issued an Anti-Corruption guideline and communicated it internally and externally, available at the parent company's website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Antikorruption.pdf</p> <p>The financial system is annually audited by an external tax auditor.</p> <p>The Entity is not directly active on the market but all purchasing and sales of metals is undertaken by the parent company Alu-Met. Annual financial audits (conducted by licensed external tax auditor) demonstrate correct financial behaviour of the Entity.</p>
1.3 Code of Conduct	Conformance	<p>The Entity's parent company Alu-Met has issued and communicated documents (social standards document, anti-corruption guideline) including principles relevant to environmental, social and governance performance. These rules apply also for the Entity. These documents can be accessed via: https://www.alu-met.com/werte-handeln</p> <p>The documents are subject to annual review.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has issued and communicated internally and publicly a company Policy statement addressing environmental, social and governance facets. The document can be accessed via: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as their Environmental and Health and Safety Management System, the Entity has senior management endorsement and support through

CRITERION	RATING	COMMENT
		<p>provision of resources and regular review of the Policies. The Entity obtained ISO 14001 and ISO 50001 certification, which is consistent with their ASI Performance Standard Certification Scope.</p>
<p>2.1c Environmental, Social, and Governance Policy (communication)</p>	<p>Conformance</p>	<p>The Entity has communicated the Alu-Met Group's company Policy internally (intranet) and externally as appropriate, available on the company website: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf</p> <p>Note: All purchase and sales are undertaken by the parent company.</p>
<p>2.2 Leadership</p>	<p>Conformance</p>	<p>The Entity's Managing Director has ultimate responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation. The role is supported by the Head of Quality as the ASI representative for the Alu-Met Group.</p>
<p>2.3a Environmental and Social Management Systems (environmental)</p>	<p>Conformance</p>	<p>The Entity has documented and implemented an integrated Management System, with certified facets according to ISO 14001:2015 and ISO 50001:2018. The certificates are available on the Alu-Met website: https://www.alu-met.com/verkauf/zertifikate/</p> <p>There are no overdue open actions from the latest audit report of the certification body.</p>
<p>2.3b Environmental and Social Management Systems (social)</p>	<p>Conformance</p>	<p>Although not yet developed to the same extent as the system for environment and energy (for these facets the Entity holds certificates according to ISO 14001 and ISO 50001), human and labour rights are actively managed.</p> <p>Some documented processes and procedures are in place, which are adequate (considering the size and circumstances of the company) at this stage of implementation of the Entity's Social Management System.</p> <p>Relevant elements of a Management System have been defined (goals, action plan, internal audit, review).</p>
<p>2.4 Responsible Sourcing</p>	<p>Conformance</p>	<p>The Alu-Met Group has issued its Responsible Sourcing Policy 'Verantwortungsvolle Beschaffung' (Responsible Sourcing) in German, available at: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Beschaffungspolitik_.pdf</p> <p>A supplier Due Diligence process has been implemented and is applied.</p>

CRITERION	RATING	COMMENT
		The Entity is not directly active on the market and all purchasing and sales of metals is undertaken by the parent company.
2.5 Impact Assessments	Conformance	<p>A procedure specifying how to manage bigger projects is established. Since the Entity's parent company joined ASI, there has been no ongoing project requiring the Entity to assess cultural and Human Rights impacts.</p> <p>The Entity has undertaken an assessment of environmental and health and safety aspects for projects undertaken, which was also part of the ongoing permitting process.</p>
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans, developed in collaboration with relevant stakeholders such as the local fire brigade. The Entity holds an ISO 14001 certification which is current and in line with the Entity's Certification Scope under the ASI Performance Standard.
2.7 Mergers and Acquisitions	Conformance	<p>The Entity did not undergo or plan a merger or acquisition (M&A) since the Entity's parent company joined ASI.</p> <p>However, a process has been defined to manage M&As, should it become relevant.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity is not the owner of the production facility and the closure terms are defined in the rental agreement.</p> <p>The site is a well-established site; there no known plans for closing or decommissioning.</p> <p>The site is located in a highly regulated country (Germany), where relevant projects and changes (including closure and decommissioning) must undergo a thorough analysis and authorization process and the Entity has systems in place to manage this effectively.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Alu-Met Group has prepared a Sustainability Report to report on the governance approach and material environmental, social and economic impacts for the Entity (and the Speedline Aluminium (Schlins) plant). The report is based on GRI (Global Reporting Initiative) G4 Criteria. The report is published on the Alu-Met website:</p> <p>https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf</p>

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	<p>The Entity's parent company has publicly disclosed information on fines of the Alu-Met Group in its Sustainability Report (Section 3.8 page 26): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf</p> <p>There were no fines or similar paid in the reporting period or the current year of this audit.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>According to the Entity's tax auditor's report 2019 as well as testified by management, all payments to Governments were made on a legal and/or contractual basis.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has established accessible complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. A dedicated email address has been established, accessible for all stakeholders: help@alu-met.com</p> <p>A physical complaint mailbox has opened the possibility for anonymous worker complaints. Due to the size and nature of the business, stakeholders can also easily reach top management directly.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has evaluated the life cycle impacts of its products and published the data in an Environmental Product Declaration (EPD), accessible from the following websites: www.ibu-epd.com https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Aluminium-Strangpressbolzen.pdf</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has evaluated the life cycle impacts of its products and published the data in an Environmental Product Declaration (EPD), accessible from the following websites: www.ibu-epd.com https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Aluminium-Strangpressbolzen.pdf</p> <p>The EPD is based on a cradle-to-gate approach and underlying norms are ISO 14025, EN 15804+A1 and ISO 14044.</p>

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Product Declaration (EPD) published by the Alu-Met Group contains details of the boundaries, underlying assumptions and data sources, available from the website: https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/EPD_Alumet_Aluminium-Strangpressbolzen.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	As confirmed by interviews, document review and the site tour, the Entity has systems and a robust program in place to recycle 100% of its Aluminium Process Scrap, either within its own site, within the Alu-Met Group or at external partners.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of Aluminium. The effectiveness of these processes has been demonstrated through document review and a site tour.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a remelter of Aluminium, the Entity has the clearly defined strategy to maximise the use of scrap. Management is monitoring the status of implementation of the strategy on a daily basis by updating and discussing related performance indicators.
4.4b Collection and recycling of products at end-of-life (engagement)	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.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses material GHG emissions and energy use by source on an annual basis, see the Sustainability Report (pages 20-23): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf The Entity has implemented and maintains an Energy Management System according to ISO 50001:2018: https://www.alu-met.com/fileadmin/daten/pdf/Zertifikate/AGN/011120

CRITERION	RATING	COMMENT
		20/960402_Aluminium_GmbH_Nachrodt_50001_2U_EA_20_fp_DE.pdf
5.2 GHG emissions reductions	Conformance	In line with the Energy Management System which is certified to ISO 50001, the Entity has published GHG emissions reduction targets and established a plan to achieve these targets, see the Sustainability Report (page 23): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	In the Alu-Met Sustainability Report, the Entity periodically reports on its Emissions to Air that have adverse effects on humans or the environment. As requested by the relevant authority, measurements are carried by an accredited independent laboratory every three years.
6.2 Discharges to Water	Conformance	The Entity discharges only cooling water directly into waters (creeks or rivers). The other effluents (storm water and sanitary water) are treated in the publicly owned waste water treatment plant. The directly discharged water does not have adverse effects on humans or the environment (the discharged quantity of the cooling water is less than 0,001% of the river's flow rate). The Entity regularly analyses the characteristics of the water.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	As part of the Environmental Management System, certified according to ISO 14001, the Entity has a systematic approach to risk assessment which includes prevention and detection of Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	As part of the Environmental Management System, certified according to ISO 14001, the Entity has established management and external communication plans, compliance controls and has a monitoring programme in place to prevent and detect

CRITERION	RATING	COMMENT
		Spills and Leakage (daily inspection, systematic maintenance).
6.4a Reporting of Spills (immediate disclosure)	Conformance	As part of the Environmental Management System, certified according to ISO 14001, the Entity has procedures in place to ensure disclosure to affected parties the volume, type and potential impact of significant Spills immediately after an incident. As reported in the Sustainability Report 2019 there was no significant release of substances in the 2019 reporting year (page 26): https://www.alu-met.com .
6.4b Reporting of Spills (regular reporting)	Not Applicable	This Criterion is currently not applicable, as there were no relevant Spills or uncontrolled release of hazardous material at the site since the parent company bought the Entity in 1999.
6.5a Waste management and reporting (strategy)	Conformance	In line with the Environmental Management System, certified according to ISO 14001, the Entity has implemented a waste management strategy which is based on the Waste Mitigation Hierarchy (i.e. avoid, re-use, reduce, recycle).
6.5b Waste management and reporting (disclosure)	Conformance	In line with the Environmental Management System, certified according to ISO 14001, the Entity has collected data on Waste generation and disposal. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods, are reported in the publicly available Sustainability Report (pages 24): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity works continually to maximise the recovery of Aluminium by treatment of Dross and Dross residues. Key factors are trained workers, technical parameters of the furnace and the remelting process. All Dross is sent for recycling.
6.8b Dross (recycling)	Conformance	The Entity sends all recovered Dross to a recycling facility.
6.8c Dross (review of alternatives)	Conformance	As the Entity sends all recovered Dross to specialised recycling companies, there are no Dross residues on site and therefore none are sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a system in place to identify and map its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Not Applicable	This Criterion is not applicable, as the Entity does not extract water from watersheds, and uses only a small amount of municipal water.
7.2a Water management (management plans)	Not Applicable	The evaluation did not identify a significant risk, as the annual usage of spring water is approximately 30,000 cubic meters per annum and the production site is not located in a water scarce area (annual precipitation approximately 800-1100 mm). Therefore, this Criterion is not applicable to the Entity.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the water risk assessment (see Criterion 7.1b) did not identify a material risk that would need to be managed.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water consumption in the Sustainability Report (pages 18-20): https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Alu-met_Nachhaltigkeitsbericht_160821.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The production site is in an industrial area of approximately 2.5 hectares. A detailed Biodiversity Impact Assessment for the Entity's activities was conducted in 2021 by a specialised external consultancy firm. The assessment contained detailed proposals to the Entity's management to direct the development and implementation of a Biodiversity Action Plan.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity Action Plan has been established and implementation of specific actions is either ongoing or complete. The Plan is regularly reviewed and updated. Biodiversity is an issue that has been incorporated into the Entity's annual management review process.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	A Biodiversity Action Plan has been established and is being implemented. The Plan was developed in consultation with an external biodiversity specialist. The Biodiversity Mitigation Hierarchy has been considered in the development of this Plan.
8.2c Biodiversity management (reporting)	Conformance	The achieved biodiversity outcomes are made publicly available in the Entity's Sustainability Report 2022 (section 3.8) refer to: https://alu-met.com/standorte/#!/fancybox/0a9cfd39 Biodiversity actions are currently limited to measures undertaken within the premises of the Entity.
8.3 Alien Species	Conformance	During the Entity's thermal processing of the Aluminium Scrap, all potential Alien Species and pathogens are destroyed. A residual risk includes supplied wooden pallets, which are externally incinerated (with heat recovery). The factory area within the Entity is regularly cleaned of neophytes (during summer periods).
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity’s parent company 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, please refer to: https://www.alu-met.com/de/werte-handeln/
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a documented Human Rights Due Diligence assessment based on the MVO Nederland CSR Risk Check methodology. Please refer to: https://www.mvorisicochecker.nl/en
9.1c Human Rights Due Diligence (remediation)	Conformance	The Human Rights assessment has confirmed that there are no salient adverse Human Rights impacts present at the Entity. This was confirmed during interviews during the audit. The Entity has not caused or contributed to adverse Human Rights impacts. Therefore, no remediation is required.
9.2 Women’s Rights	Conformance	As confirmed by site tour, document review and interviews, the Entity has developed and implemented policies, systems, procedures and processes that conform to the women’s rights requirements.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe) as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe) as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply to the Entity (which is located in central Europe) as Indigenous Peoples or their lands, territories and resources or sacred or cultural heritage sites and values within the Entity’s

CRITERION	RATING	COMMENT
		Area of Influence are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion does not apply to the Entity as no Resettlements have been considered or taken place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply to the Entity as no Resettlements have been considered or taken place during the period since joining ASI, or expected to occur during the certification period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities. All relevant activities are subject to a permitting process and the Entity maintains adequate contact with Community officials.
9.7b Local Communities (impacts)	Conformance	The Entity prevents any adverse impacts on the Local Community's livelihoods. Noise caused by unloading operations and production processes is the most relevant adverse impact. The Entity works continually to reduce these emissions and demonstrated compliance with related legal requirements.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion does not apply to the Entity as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no salient issues with Local Communities and therefore no need for action.
9.8 Conflict-Affected and High-Risk Areas	Minor Non-Conformance	The Entity does not purchase metals directly - these are sourced by Alu-Met GmbH as part of the Alu-met Group. All the Groups' Aluminium suppliers are ASI Members. Alu-met has established a systematic supplier management which includes risk identification and evaluation, to ensure that the Group does not contribute directly or indirectly to armed conflict and/or Human Rights abuses.
9.9 Security practice	Conformance	Document review and worker interviews confirmed that the private security provider respects human rights in line with recognised standards and good practices. The Entity employs unarmed guards only.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the rights of Workers to unite freely in the Unions and seek representation without interference. A freely elected Worker representation is in place. As confirmed by interviews with workers and management, the Entity takes an open attitude towards the election of a works council. However, the Entity is not bound by Collective Bargaining Agreements (CBA) negotiated between the employer association and the relevant Union. A CBA is agreed between the Worker representation and the employer.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	All interviewed Workers confirmed that the employer respects their right to Collective Bargaining. Several collective agreements have been negotiated between the freely elected works council and the Entity's management. However, the Entity is not participating in or bound by Collective Bargaining Agreements negotiated between the employer association and the relevant Union.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Germany, the country in which the Entity operates, Applicable Law does neither restrict the right to Freedom of Association nor Collective Bargaining. The Entity has an open position on employee representation.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker was 20 years old at the time of the audit, as confirmed by interviews and the employee roster.
10.2b Child Labour (hazardous)	Conformance	As confirmed by interviews with Workers and management, the Entity does not employ minors under the age of 15 years. The youngest Worker employed was 20 years old at the time of the audit. Hence, the Entity is not engaging in Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	As confirmed by interviews with Workers and management, the Entity does not employ minors under the age of 15 years. The youngest Worker employed was 20 years old at the time of the Audit. Hence, the Entity is not engaging in any Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	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

CRITERION	RATING	COMMENT
		through any employment or recruitment agencies, as confirmed by interviews with Workers and management as well as a document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not require Workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not hold Workers in debt bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace, as confirmed by interviews and document review. The site does not employ any armed security staff.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity also does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's Human Rights Due Diligence assessment.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in nor support the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-Discrimination and communicates this commitment in its Company Policy. As confirmed by interviews and document review, the Entity does not actively engage in Discrimination for the grounds mentioned in this Criterion.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers. There are nominated workers acting as Safety Representatives (Sicherheitsbeauftragte), a joint Health and Safety Committee is established and an anonymous letter box for raising suggestions or concerns is also 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 institutionalized systems for employee engagement.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of inadequate and unacceptable treatment of Workers as mentioned in the requirements of this Criterion.
10.7a Remuneration (living wage)	Conformance	As verified by a review of payslips time records and interviews, the Entity does respect the right of Workers to a living wage. Wages are oriented on the pay that has been set by the Collective Bargaining Agreement of the employer's association and the Union (industry standard), although the Entity does not participate in these negotiations. Instead, a collective agreement has been negotiated directly between the Entity's works council and the management.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented. Payments are made via transfer to employee's bank accounts and pay slips are provided to employees, which are detailed and understandable.
10.8 Working Time	Conformance	Working Time is part of each employment contract. A clocking-in system is in place. Records are on hand. Overtime is voluntary and due to the shift system in place, is very limited.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity's parent company has issued and made publicly available its Management Policy, which includes Occupational Health and Safety, please refer: https://www.alu-met.com/fileadmin/daten/pdf/Werte_und_Handeln/Unternehmenspolitik.pdf

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	As confirmed by interviews with Workers and Management, the Entity applies its Occupational Health and Safety Policy to all Workers and Visitors present at the site.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Management Policy does include the commitment to comply with all applicable legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has issued and communicated its Policy regarding Occupational Health and Safety. It states expressly, that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented an Occupational Health and Safety Management System and holds a valid ISO 45001:2018 certificate, available at: https://www.alu-met.com/verkauf/zertifikate
11.3 Employee engagement on health and safety	Conformance	The Entity has mechanisms in place to discuss Occupational Health and Safety issues with the Management and Workers (meetings between Worker representatives, appointed Safety Representatives from the workforce, 'Sicherheitsbeauftragte' (security officer) and a joint Health and Safety Committee).
11.4 OH&S performance	Conformance	The Entity has developed and monitors various leading and lagging indicators on a monthly basis in accordance with the requirements of the ASI Performance Standard.

Document Control and Version History

Revision	Date	Notes
0	5 January 2021	Initial Certification Audit (Provisional Certification)
1	4 August 2021	Surveillance Audit
2	28 February 2022	Surveillance Audit – Full Certification
3	15 November 2024	Surveillance Audit