

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Commonwealth Rolled Products

CERTIFICATE NUMBER
402

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

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

DATE OF ISSUE

11 NOVEMBER 2024

DATE OF EXPIRY

10 NOVEMBER 2025

CERTIFIED SINCE

11 NOVEMBER 2024

AUTHORISED BY

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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

All activities at the Commonwealth Rolled Products site in Kentucky, USA including Aluminium Remelting/Refining, Casting, Hot Rolling, Cold Rolling, Continuous Heat Treatment, Finishing and Pack/Ship.

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Commonwealth Rolled Products, Inc.
ENTITY NAME	Commonwealth Rolled Products, Inc.
CERTIFICATION SCOPE	All activities at the Commonwealth Rolled Products site in Kentucky, USA including Aluminium Remelting/Refining, Casting, Hot Rolling, Cold Rolling, Continuous Heat Treatment, Finishing and Pack/Ship.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-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	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">6 – 14 August 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 October 2024
AUDIT SCOPE	<p><u>Initial Certification Audit – Provisional (6 – 14 August 2024)</u></p> <p>The Audit Scope includes all activities at the Commonwealth Rolled Products, Inc site in Kentucky, USA.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 11 November 2024 – 10 November 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 10 May 2025

CERTIFICATE NUMBER 402



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

Commonwealth Rolled Products, Inc., (the 'Entity'), is a North American producer of flat-rolled Aluminium products that has been producing industry-leading quality since 1966. It operates a fully integrated mill located in Lewisport, KY that includes state-of-the-art recycling, casting lines, hot mill, cold mills, two Continuous Annealing Lines with Pre-Treatment (CALP), and a range of finishing capabilities. The Entity has a Corporate Sales Office in Independence, OH and a Research and Development Center in Madison Heights, MI. The Entity produces approximately 270k metric tonnes of coiled sheet for various end uses including automotive, building and construction, distribution, transportation, and other specialty products. The Entity currently employs over 1,100 people, 13% of which are female, and maintains processing equipment spread over a 53-acre under-roof facility. The site is located in Hancock County which is the largest external stakeholder. There are currently no biodiversity nor cultural heritage sensitive areas identified within the Entity's area of influence.

Further information about the Entity is available on the Commonwealth Rolled Products, Inc website:

<https://commonwealthrolledproducts.com>

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	Low	Medium	Low	LOW
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	High	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes that allow for adequate awareness of legal requirements and ensure Compliance with Applicable Laws and regulations. A quarterly survey of new developments in laws and regulations is conducted for Environment, Health and Safety.
1.2 Anti-Corruption	Conformance	The Entity has established a system to ensure ethical business conduct and Legal Compliance. Internal tools and mechanisms are strictly followed to prevent corruption and unethical business practices.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes environmental, social, and governance performance principles. The Entity Business Code of Conduct and Ethics can be accessed at:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Code_of_Business_Conduct_and_Ethics_revMay2024-External.pdf</p> <p>The Code applies to all suppliers. However, a specific Code of Conduct and Sustainability Policy have been implemented for suppliers:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/CRP_Supplier_Sustainability_Policy_revMay2024.pdf</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity has environmental, social, and governance policies and practices consistent with the ASI Performance Standard. A Health, Safety, and Environmental (HSE) Policy is established and is communicated to employees. A Supplier Sustainability Policy, Diversity, Equity, and Inclusion Policy, and a Policy Against Workplace Harassment are also established, reviewed and communicated. The policies are reviewed, stored, and communicated to employees. However, Senior Management has not yet endorsed the Code of Conduct as well as the Diversity, Equity, and Inclusion Policy by acknowledging and signing the Policy statements.
2.2a-c Leadership	Conformance	The Entity's Chief Technical Officer implements and communicates the requirements of ASI Certification. The ASI Certification Status of the Entity is monitored by the Sustainability Committee and Sustainability Summit and reviewed quarterly. The Entity provides sufficient cross-functional teams and expertise to establish, implement, maintain and improve its ASI Certification Program.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity maintains an ISO 14001-Certified Environmental Management system and has recently been re-certified, with no Non-Conformances raised.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Major Non-Conformance	<p>The Entity demonstrates a certain awareness of Social Management through proactive actions and documents like Policies, platforms to manage suppliers and community engagement.</p> <p>https://Commonwealthrolledproducts.com/sustainability/</p> <p>However, there is currently no systematic and formal Social Management System.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and publicly disclosed a Supplier Sustainability Policy, which includes Responsible Sourcing commitments. The Entity uses an external platform to qualify most suppliers, current and future. The platform addresses Finance, Safety, Security, Cyber Security and ESG. The Platform Risk Assessment complies with the OECD Guidance.</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/CRP_Supplier_Sustainability_Policy_revMay2024.pdf</p> <p>The Entity has also implemented a Supplier Code of Business Conduct and Ethics describing the supplier's obligations to conduct business with the Entity. The Supplier Code of Business Conduct is available at:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has developed a Management of Change Process applied when a significant change occurs. All major projects must go through an impact study according to regulatory requirements. The Impact Assessment must include the project's environmental, social and economic impacts. Every project undergoes a Health, Safety and Environment review process and is documented in the Management of Change process that identifies and addresses environmental, H&S, community and potential impacts. No significant changes have taken place in the last five years.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has developed a Management of Change Process which is applied when a significant change occurs. All major projects must go through an impact study according to regulatory requirements. The Impact Assessment must include the project's environmental, social, and economic impacts. Every project undergoes a health, safety, and environment review process. It is documented in the Management of Change Process, which identifies and addresses potential impacts on the environment, H&S, community and biodiversity. No significant changes have taken place in the last five years.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has Emergency Response Plans covering several different incident scenarios. The plans are reviewed periodically and are aligned with the state regulatory requirements. An Oil Spill Prevention, Control and Countermeasure (SPCC) Plan and Best Management Practices Plan (BMPP) are also established to identify, control and mitigate the impacts of chemical spills and stormwater runoff. Emergency drills are conducted at regular intervals and documented via drill reports. The Entity chairs the quarterly Local Emergency Planning Committee (LEPC) meetings in collaboration with relevant local stakeholders, including the fire, medical, and police departments. The Emergency Response Plans, SPCC and BMPP are disclosed to relevant stakeholders as required.</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan (BRP) detailing how the Entity would respond if operations were suspended. Operational procedures, a communication strategy and plan is also in place. Prior to developing the BRP, a risk assessment was conducted to identify main risks and corresponding responses.
2.9a-b Mergers and Acquisitions	Conformance	The Entity uses an ESG Risk Assessment/Due Diligence tool in any Merger or Acquisition case. The tool identifies risks in terms of ESG. As required, the Entity would identify and determine mitigation actions, the resources needed, and an action plan for each risk identified. There is no plan or strategy to acquire or merge with another operation site or Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a detailed Plant Closure Plan outlining how it would respond to the decommissioning of a piece of equipment or site. Currently, there is no plan for a large decommissioning. The Plan addresses security and the environment, including consideration of on-site radiation sources.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses an Annual Sustainability Report. The Report contain key ESG criteria and governance metrics utilising frameworks as defined by the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). The 2022 Sustainability Report is available at: https://Commonwealthrolledproducts.com/wp-content/uploads/2023/12/The_EntitySR_v6-Final.pdf
3.2 Non-Compliance and Liabilities	Conformance	The Entity is subject to disclosure of environmental liabilities, including permits, violations and fines for air, water, and Waste through EPA requirements, and these are published on the EPA website at: https://echo.epa.gov/detailed-facility-report?fid=110058164187#enforcement The Health and Safety violations and penalties are also publicly disclosed on the Occupational Safety and Health Administration (OSHA) website at: https://www.osha.gov/ords/imis/establishment.search?p_logger=1&establishment=commonwealth+rolled+products&State=KY&officetype=all&Office=all&sitezip=&p_case=all&p_violations_exist=all&startmonth=09&startday=02&startyear=2019&endmonth=09&endday=02&endyear=2024 No financial, labour, violations, Non-Compliance, or fines were applied to The Entity in the last two years.
3.3a-c Payments to Governments	Conformance	The Entity does not allow payment to the government except in the case of taxes and fees, and the Code of Business Conduct and Ethics strictly prohibits contributions to political parties. https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Code_of_Business_Conduct_and_Ethics_revMay2024-External.pdf An independent audit firm audits the Entity's annual financial statements. Other contributions made by the Entity are widely made as sponsorship, school boards, and charitable organisations.

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	The Entity has implemented an internal Complaint and Grievance resolution process for any issue and answers every internal request. However, a Complaints Resolution Mechanism for the external Affected Populations and Organisations is currently lacking. The Entity utilises the formal complaints mechanism through the Kentucky Department of Environmental Protection and Kentucky OSHA for environmental, Health and Safety concerns. However, no other Complaints Resolution Mechanism was developed by the Entity and shared with Affected Populations and Organisations.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity uses The Aluminium Association analysis to evaluate the Life Cycle Assessment of its major Aluminium product lines. The full report on the Environmental Footprint of Semi-Fabricated Aluminium Products in North America Life Cycle Assessment is available at:</p> <p>https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</p> <p>This report details Cradle-to-Gate and Cradle-to-Grave for Industrial and Automotive sheet products, which are the Entity's two main product lines. A Technical toolkit also summarising assessment results is available at:</p> <p>https://www.aluminum.org/SustainabilityReports</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	No customer has requested a detailed Cradle-to-Gate Life Cycle Assessment (LCA) on any specific product to date. However, the Company has engaged a third party to conduct a full LCA per ISO 14040 and ISO 14044 Standards addressing eight specific product alloys. No information on LCA has been publicly disclosed to date.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity as it only produces standardised semi-fabricated products and as such, the customer establishes the product specifications.
4.3a-b Aluminium Process Scrap	Conformance	The Entity recycles 100% of Scrap generated internally. The Entity utilises Managed Process teams to work on projects to reduce the amount of internal Scrap generation and maximise the amount of Scrap content in the final product while meeting customer specifications and requirements. In addition to internal process Scrap, the Entity purchases Aluminium Scrap to reintroduce it into the process. The Entity efficiently segregates Scrap by both alloy and grade, making it easy to introduce back into the production process. Metrics are monitored regularly to track the amount of Aluminium Scrap by alloy.
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 is not involved in collecting and Recycling End-of-Life Products. However, it is a member of the Recycled Materials Association (https://www.isri.org/rema) and is engaged with its largest customer on initiatives that align with the ASI Performance Standards

CRITERION	RATING	COMMENT
		circular economy objectives. A purchased Scrap strategy is part of the Entity's Business Plan. Purchased Scrap is utilised in the process, and the Entity looks to increase its use in the future.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity GHG Emissions are calculated using standardised methods and consumption data. Material Emissions are natural gas used by stationary equipment and electricity from the local grid. Other Energy and Emission sources are calculated but not included as these are not deemed material (5% or less of total emission). GHG Emission and Energy use is disclosed in the Annual Sustainability Report: https://Commonwealthrolledproducts.com/sustainability/</p> <p>The Report discloses the Scope 1 and 2 Emissions from 2019 to 2022, 2019 being the baseline year. The 2023 report will disclose Scope 1 and 2. However, the Entity did not have a Third Party independently verifying the GHG Emission data. The Entity will obtain independent assurance, of the 2023 Scope 1 and 2 GHG emissions for the upcoming 2023 Sustainability Report.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has committed to becoming carbon neutral by 2038, with annual intermediate targets. A secondary objective to reduce carbon intensity by 40% by 2030 is also established. The Reduction Plan is reviewed quarterly and includes improvement projects addressing Scope 1 and 2 Emissions. The GHG Emissions Reduction Plan is disclosed in the Sustainability Report: https://Commonwealthrolledproducts.com/sustainability/</p> <p>However, no evidence exists that the GHG Emission Reduction pathway was established using the ASI Endorsed Methodology. Also, Scope 3 Category 1 Emissions are not included in the established pathway, and although the emission target is set to 2038, the GHG Emission Reduction Plan currently ends in 2029. Finally, the GHG Emission pathway is currently not publicly disclosed, and the Reduction Plan is only partially disclosed.</p>
5.4 GHG Emissions Management	Conformance	The GHG Emissions are managed through the Entity's Environmental Management System. Emission sources are identified, and operational controls and mitigation measures are taken to control and reduce GHG Emissions, such as engineering controls, work instructions, and improvement projects. A Sustainability Council has also been established to provide oversight and guidance for all ESG activities and initiatives related to enhancing, developing, and defining the Entity's strategic direction and long-term sustainability goals, including the review of the GHG Emission pathway and Reduction Plans.

CRITERION	RATING	COMMENT
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity installation and operations are subject to an Air Quality permit issued by the Environmental Protection Agency. The site quantifies its Air Emissions as per the permit requirements. The Entity annually discloses all Air Emissions to the Environmental Protection Agency (EPA):</p> <p>https://echo.epa.gov/air-pollutant-report?fid=110058164187</p> <p>The plan to minimise exposure to and impacts from Emissions to Air is detailed in the air quality permit. The plan was revised and submitted in November 2022 and is valid until October 2026. The Title V permit is valid for five years.</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity installation and operations are subject to a Discharge permit covering wastewater discharges. The Entity has one outfall for wastewater discharge: process wastewater, non-contact cooling waters, and stormwater runoff. The Entity quantifies its discharge to water for all potential pollutants as listed in the permit requirements. The Entity annually discloses all discharges to water through a Discharge Monitoring Report available on the Environmental Protection Agency (EPA) website:</p> <p>https://echo.epa.gov/trends/loading-tool/reports/dmr-pollutant-loading?year=2024&permit_id=KY0002666</p> <p>A Best Management Practice Plan (BMPP) is documented to describe the control measures to minimise exposure to and impacts from discharge to water and is reviewed annually. In case of Non-Compliance, a root cause analysis is performed, and the Best Management Practice Plan is revised as needed. The Management of the Change Process also considers potential impacts on water discharge. However, there is no evidence that information on the Best Management Practice Plan (BMPP) is publicly disclosed.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented an Oil Spill Prevention, Control and Countermeasure (SPCC) Plan that identifies, assesses and manages all major risks relating to oil Spills. The risks of Spills and Leakages from chemicals are also documented and assessed within the site's Emergency Response Plan. The site has defined a Spill Response Team. A Local Emergency Planning Committee Tier 2 emergency plan is also established to determine how to respond in case of Spill or Leakage. The Entity also participates in the Local Emergency Planning Committee, which allows the Company to communicate and share spill and Leakage risks with Affected Populations and Organisations. Workers are trained annually on Spill prevention plans and emergency response plans.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>No Spills or Leakages occurred at the Entity facility in the last year. In case of a major spill or leakage, the communication protocol of the Local Emergency Planning Committee Tier 2 Emergency Plan will be applied to contact potentially affected populations and organisations. The Sustainability Report will disclose the Impacts Assessment of material spills, root causes, and remediation actions taken.</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The quantity of Hazardous and Non-Hazardous Waste is tracked on monitoring spreadsheets. Hazardous Waste and associated Waste disposal methods are monitored as per local regulatory requirements.</p>

CRITERION	RATING	COMMENT
		<p>The quantities of both Hazardous and Non-Hazardous Wastes are disclosed annually in the Entity's Sustainability Report: https://Commonwealthrolledproducts.com/sustainability/</p> <p>The Entity has established a Hazardous Waste Management Plan and associated work instructions. The Entity has audited and verified that the Waste disposal contractor has adequate permits to process the Waste. Non-Hazardous Waste is quantified using data from the Waste disposal service provider. The material impacts on human well-being and the environment associated with waste are assessed through the impacts assessment process of the Environmental Management System. However, the Entity has not developed its Waste Management strategy per the Waste mitigation hierarchy. Additionally, with the exception of percentage of Recycled Waste, the associated Waste disposal method is also not publicly disclosed (landfill, incineration, treatment, reuse, etc.), and used oil and baghouse dusts are not considered in the waste quantification.</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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity stores all Dross generated in a closed building segregated by alloy type. Dross is sent to suppliers regularly, and a specialised supplier treats the Dross and returns the remaining Aluminium to the Entity, reintroducing it into the process. Dross represents a low percentage of the total production at the Entity. Recovery of Aluminium varies, depending on the nature of the alloy. The difference is sent to landfills through suppliers. The Entity continually looks for ways to reduce the Dross sent to landfills.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity withdraws up to 14 million gallons daily from 12 wells located adjacent to the Ohio River. Daily usage average is around 9.5 million gallons per day. Potable water comes from the City of Lewisport utility service. Water withdrawal is regularly monitored through data from measurement instruments. Water withdrawal data is publicly disclosed in the annual Sustainability Report: https://Commonwealthrolledproducts.com/sustainability/</p> <p>A Water Risk Assessment has been conducted following Worldwide Fund for Nature (WWF) Water Risk Filter, WWF's Contextual Water Targets guide, and World Resources Institute (WRI) water risks tool: Aqueduct. Assessments show a low-risk area in the Area of Influence without impacting the community. However, the Entity's water use is not publicly disclosed.</p>
7.2a-e Water Management	Conformance	The Entity activities were identified, and no watersheds within the Area of Influence exist. The Water Risk Assessment has determined the risks to be low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>A Biodiversity Assessment from the Energy and Environment Cabinet of the State of Kentucky was performed. This assessment identified the endangered, threatened, or special concern plants, animals, features, or exemplary natural communities monitored by the State for the site Area of Influence, which consists of the property with a buffer area. It also identifies the applicable laws and regulations. No botanical or ecological occurrence was identified within the Area of Influence. Nine animal species were identified as potential occurrences, but they were never observed or seen for the last time in 1990.</p> <p>The assessment also refers to a series of recommendations related to the activities. Most of them concern riverbanks and riparian areas and will be implemented in case of a project or changes in those areas.</p> <p>Although the Area of Influence and applicable laws were identified, the risks and potential impacts on biodiversity and ecosystem services from the land use and activities within the Area of Influence are not formally assessed, and no conclusion is documented, except for the water withdrawal activity.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as no material risks and potential impacts on Biodiversity and ecosystem services have been identified through the Biodiversity Assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as no material risks and potential impacts on Biodiversity and ecosystem services have been identified through the Biodiversity Assessment.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as no material risks and potential impacts on Biodiversity and ecosystem services have been identified through the Biodiversity Assessment.
8.4 Alien Species	Conformance	The Entity follows the Customs-Trade Partnership Against Terrorism (C-TPAT) Checklist for Tractor / Trailer Inspections for required practices to prevent the spread of invasive species. Any wood packaging used is treated on site.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no UNESCO World Heritage properties adjacent to the Entity's facilities.
8.6a-d Protected Areas	Conformance	There are no Protected Areas within the Entity's Area of Influence. The closest such Area is a small Protected landscape identified as an Emergency Watershed Protection Program—Floodplain Easement in Indiana, situated approximately four miles upstream from the site. However, the Entity's Change Management Process would consider such potential impact in case of major changes or projects.
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

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Major Non-Conformance	<p>The Entity is committed to Human Rights, and a documented commitment to the UN Guiding Principles on Business and Human Rights Principles through its Code of Business Conduct and Ethics, available at:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Code_of_Business_Conduct_and_Ethics_revMay2024-External.pdf</p> <p>Although commitment is demonstrated, no Human Rights Due Diligence assessment has been conducted, and no gender-responsive Human Rights Due Diligence process has been developed. Additionally, no mapping of Affected Populations and Organisations has been undertaken, and no Complaints Resolution Mechanism regarding Human Rights potential is in place.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has developed a 'Diversity, Equity, and Inclusion Policy', however this Policy has not yet been publicly disclosed. Although the Entity is proactive in Gender Equity and Women's Empowerment, it has never publicly disclosed its Gender Equity and Diversity status. In addition, no program addresses all the Criterion's requirements, and there is no public disclosure regarding the effectiveness of the measures taken to promote Gender Equity annually.</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the location's Area of Influence.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the location's Area of Influence.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity as no Indigenous Peoples are present in the location's Area of Influence.</p>
9.5a Cultural and Sacred Heritage - Identification	Minor Non-Conformance	<p>The Entity has determined that there are no Cultural and Sacred Heritage sites on its property. However, there is no Procedure in place that has methodologies that outline the identification of Sacred and/or Cultural Heritage sites and values within its Area of Influence.</p>
9.5b Cultural and Sacred Heritage - Impacts	Conformance	<p>No project at the Entity will impact any cultural, historical, or spiritual heritage essential to Indigenous Peoples' identities.</p>
9.6a-i Displacement	Not Applicable	<p>There is currently no ongoing or planned project for displacement. If such a project arises, a management process will be developed.</p>
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity largely contributes to the Social and Community through donations and sponsorship of programs; however, it did not implement any formal plan to identify, prevent, monitor, mitigate, and account for any significant impacts, including Health and Safety,</p>

CRITERION	RATING	COMMENT
		social and cultural Human Rights, and environmental impacts resulting from its activities.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Major Non-Conformance	Whilst the Entity has developed Supply Chain Policies there was no evidence that it exercised any risk-based Due Diligence over its Aluminium supply chain per the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). Supply Code of Business Conduct and Ethics is available at: https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	Whilst the Entity has developed Supply Chain Policies there was no evidence that it exercised any risk-based Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). The Entity has not yet identified and assessed risks in the supply chain. Supplier Code of Business Conduct and Ethics is available at: https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	Whilst the Entity has developed Supply Chain Policies there was no evidence that it exercised any risk-based Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). The Entity did not design and implement a strategy to respond to identified risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Minor Non-Conformance	The Entity developed Supply Chain Policies, but it didn't exercise risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst the Entity has developed Supply Chain Policies there was no evidence that it exercised any risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). The Entity has not reported annually on its supply chain Due Diligence.
9.9 Security practice	Conformance	The Entity uses an external Security agency for site security. As a supplier, the Security Agency Representative has signed a letter of conformance to the Entity's Human Rights policies and the Supplier Code of Business Conduct and Ethics. The Suppliers Code of Business Conduct and Ethics is available at: https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity demonstrates its commitment to and approach to Freedom of Association as Workers are unionised, and the Actual Collective Bargaining Agreement is valid until 2025.

CRITERION	RATING	COMMENT
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as Freedom of Association is not restricted in the United States.
10.2a Child Labour	Conformance	<p>The Entity does not hire employees under 18 years old, and suppliers and contractors are also prohibited from hiring employees under 18. The Entity is committed to avoiding Child Labour through its Code of Business Conduct and Ethics and its Supplier Code of Business Conduct and Ethics:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Code_of_Business_Conduct_and_Ethics_revMay2024-External.pdf</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf</p>
10.3a-c Forced Labour	Conformance	<p>The Entity is committed to not engaging in nor supporting the use of Forced Labour through its Code of Business Conduct and Ethics and its Supplier Code of Business Conduct and Ethics:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Code_of_Business_Conduct_and_Ethics_revMay2024-External.pdf</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/05/Supplier_Code_of_Business_Conduct_and-Ethics_revMay2024.pdf</p> <p>The Entity's Recruitment Agency acknowledged its commitment to avoid the use of slave or involuntary Labour of any kind, including prison Labour, debt bondage or Forced Labour. The Entity's Modern Slavery Statement is included in the Entity's 2022 Sustainability Report, page 40:</p> <p>https://commonwealthrolledproducts.com/wp-content/uploads/2023/12/CommonwealthSR_v6-Final.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity is firmly committed to using and promoting an approach to Non-Discrimination at all levels. This commitment is documented in its Code of Business Conduct and Ethics, Suppliers Code of Business Conduct and Ethics, and Statement on Harassment:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/07/CRP_Public_Statement_on_Harassment_or_ESG.pdf</p> <p>New employees receive dedicated training on what Discrimination consists of, as well as Harassment, racism, sexism, and how to avoid Discrimination and how to avoid encouraging such behaviour. Regular employees receive an annual refresher on Discrimination and Harassment. The Entity's 2022 Sustainability Report, page 30, publicly presents Diversity, Equity, and Inclusion metrics:</p> <p>https://commonwealthrolledproducts.com/wp-content/uploads/2023/12/CommonwealthSR_v6-Final.pdf</p>
10.5 Communication and engagement	Conformance	The Entity uses many tools to communicate various sources of information regarding working conditions and resolution of workplace and compensation issues, intimidation or Violence and Harassment. Joint Health and Safety committees, including union and Entity

CRITERION	RATING	COMMENT
		<p>representatives, are in place to communicate information and address any issues linked to Health and Safety. General means like periodic 'town hall' meetings, newsletters, and mandatory training are in place to communicate information to employees, staff and contractors. A third-party hotline, available '24/7' can be used confidentially by any person, victim or witness of Discrimination, Violence or Harassment from Entity Representatives, contractors, suppliers, clients or any other stakeholders.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity has developed an Anti-Harassment Policy which applies to all employees, suppliers, contractors, their employees or representatives, and stakeholders engaged with the Entity. The Anti-Harassment Policy is publicly disclosed at:</p> <p>https://Commonwealthrolledproducts.com/wp-content/uploads/2024/07/CRP_Public_Statement_on_Harassment_f_or_ESG.pdf.</p> <p>Employees receive periodic mandatory training dedicated to Violence and Harassment. The Entity provides its employees with a confidential hotline to report any Violence or Harassment they could witness. However, the Entity has no formal planning for a review of the Policy on any changes to the Business that alter the Material risk(s) of Violence and Harassment or on any indication of a control gap. There is no evidence however that hazards have been identified and assessed, with the participation of Workers and their representatives.</p>
10.7a-c Remuneration	Conformance	<p>The Entity's remuneration in general is significantly higher than the minimum wage. Union Workers' remuneration is defined in the Collective Bargaining Agreement. The remuneration of non-unionised employees is clearly defined and documented. Payments are made regularly. The Collective Bargaining Agreement governs the salary increase process for unionised employees. According to established rules, the Entity's process applies to non-unionised employees and provides for an annual increase. Overtime wages are defined in the Collective Bargaining Agreement and the Employee Handbook for non-unionized employees.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time, including overtime working hours, public holidays and paid annual leave. The Collective Bargaining Agreement prescribes the work time at The Entity. The work time of non-unionized employees is also clearly defined and documented. Working on shift allows production Workers to have four days off by completing the team shift cycle. Work time over 40 hours per week is recognised with overtime-specific wages. Non-unionized employees work 8 hours per day, five days a week. Work time, including overtime work, is defined in the Collective Bargaining Agreement and the Employee Handbook for non-unionized employees.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity production Workers have been unionised for many years, and their work time and remuneration conditions are written and described in the Collective Bargaining Agreement. Work conditions for staff are documented in a dedicated document. The Human Resources (HR) Department communicates information, reminders on Workers' rights and obligations, and resources available for any issues. The HR Department posts multiple publications on different boards to inform all Workers on various topics. Applicable Law does not restrict Freedom of Association and Collective Bargaining in the United States.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OHS) Management System comprising safety principles, safety elements and several work instructions. The HSE Management System Manual details the policies, responsibilities and other communication and awareness processes. Job safety analysis identifies hazards and assesses risk levels for each task in every department. Each risk is controlled or mitigated using the mitigation control hierarchy. Health and Safety Element assessments are also performed to assess key OH&S topics such as ownership, hazard recognition, training, contractor safety program, audit and inspection, hygiene, housekeeping, etc. Objectives and improvement plans are planned, monitored and documented. The Entity monitors leading and lagging Key Performance Indicators (KPI). The Entity has relevant safety sign boards in all areas of the facility. Periodic audits are also conducted to check Personal Protective Equipment (PPE).
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's HSE lead teams and the different safety committees review the OH&S Management System annually. When an incident occurs, or an investigation is performed, relevant procedures or job safety analyses are evaluated as needed. Managing the change process at the Entity identifies any additional OH&S risk that major changes or projects may create. Leading and lagging indicators, as well as comparative analyses of performance with peer Businesses, are disclosed in the annual Sustainability Report, available at: https://Commonwealthrolledproducts.com/sustainability/ In 2022, the Entity's total recordable incident rate was 0.92, which is approximately 60% lower than the industry average.
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented Safety Committees that meet routinely to discuss safety incidents and relevant safety topics. A monthly Central Safety Committee comprises nine members from all departments and management. Also, a Monthly Plantwide Safety Meeting and Monthly Department Safety Meetings are established to address OHS issues, concerns, and follow-up actions from previous meetings.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 November 2024	Initial Certification Audit – Provisional Certification