
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

KAISER ALUMINUM WARRICK LLC

CERTIFICATE
NUMBER

129

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

ERM
CERTIFICATION
AND
VERIFICATION
SERVICES

DATE OF ISSUE

16 FEBRUARY 2022

DATE OF EXPIRY

15 FEBRUARY 2025

CERTIFIED SINCE

17 MAY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Ingot casting, rolling mills and final production at the
Kaiser Aluminum Warrick LLC facility in the United
States of America (USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Kaiser Aluminum Corporation
ENTITY NAME	Kaiser Aluminum Warrick LLC
CERTIFICATION SCOPE	Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (21 March 2021)• Surveillance Audit (1 – 5 November 2021)• Surveillance Audit (19 – 22 September 2023)
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">• 21 March 2021 (Initial Certification Audit)• 1 – 5 November 2021 (Surveillance Audit)• 19 – 22 September 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 1 April 2021 (Initial Certification Audit)• 20 January 2022 (Surveillance Audit)• 13 August 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 March 2021)</u></p> <p>The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

At the time of the Audit (March 2021), access to the Entity 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 (1 – 5 November 2021)

The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (19 – 22 September 2023)

The Audit Scope includes Ingot casting, rolling mills and final production at the Kaiser Aluminum Warrick LLC facility in the United States of America (USA).

The supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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.

CERTIFICATION
PERIOD

16 February 2022 – 15 February 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

14 February 2025

CERTIFICATE
NUMBER

129

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has implemented systems to maintain awareness of and ensure ongoing compliance with applicable laws. However, the Entity's internal process does not fully allow Non-Compliance detection against specific permit conditions or regulations.
1.2 Anti-Corruption	Conformance	The Entity has developed corporate policies such as the Code of Business Conduct and Ethics and the Supplier Code of Conduct, which apply to all employees and contractors. These policies set the rules for Business Entertainment and Gifts and prohibit Bribery. These rules are displayed on the Entity's website, and the Policies are available at: https://www.kaiseraluminum.com/community-environment/policies/
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct for its employees and a Code of Conduct tailored to its suppliers, both are available on the Entity's website: https://www.kaiseraluminum.com/community-environment/policies The Entity's Code of Conduct and Ethics is communicated annually to all site employees, and the human resources department provides training.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies covering governance and social elements (Diversity, Equity, Inclusion, and Belonging Policy, Human Rights Policy, Conflict Mineral Sourcing Policy, and Corporate Governance Guidelines Policy). The Policies are available on the Entity's website: https://www.kaiseraluminum.com/community-environment/policies/
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management endorses, supports through provision of resources and regularly reviews the Entity's Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its Policies internally and externally as appropriate.
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative with overall responsibility and authority to ensure conformance to the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Minor Non-Conformance	The Entity maintains an Environmental Management System related to ISO 14001, including an Environmental Policy, and a process to identify aspects and impacts, establish objectives and goals, identify training needs, and create training plans. However, some specific documents were not updated following the Entity's acquisition by Kaiser in 2021.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a Social Administration System based on the Diversity, Equity, Inclusion, & Belonging Policy and its Human Rights Policy, according to the applicable legal requirements and the Entity's procedures.
2.4 Responsible Sourcing	Conformance	The Entity has implemented corporate policies with all contractors and suppliers on-site. The policies are based on the Entity's Code of Business Conduct & Ethics and on the Supplier Code of Conduct, where the commitments expected from its contractors are established in relation to Human Rights, Safety, Hygiene, Environmental, Legal Compliance, and Labour Rights. A communication channel is also established to report complaints or non-compliances in relation to these policies, managed by a third-party service ('In Touch'). A reporting hotline is also available to Workers and Stakeholders (toll-free at 1-866-204-9793 or by email at info@getintouch.com).
2.5 Impact Assessments	Minor Non-Conformance	The Entity has established a Management of Change Approval process that applies to all Workers and Stakeholders. This process ensures that any Major Change generating new or existing impacts must be assessed and approved by the EHS Manager. However, during the Audit the Entity was unable to provide information regarding Impact Assessments for social, cultural and Human Rights.
2.6 Emergency Response Plan	Conformance	The Entity has established an Emergency Response Action Plan and maintains an Oil Spill Prevention, Control, Countermeasures, and Facility Response Plan (specific for Oil Spills). The Entity performs an annual review of each program which is updated as required.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews its environmental, social and governance issues during Due Diligence processes for mergers, acquisitions and divestments.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews its environmental, social and governance issues during Due Diligence processes for mergers, acquisitions and divestments.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCYW		
3.1 Sustainability Reporting	Conformance	<p>Via the Kaiser Corporate group company, the Entity publicly discloses its governance approach and Material environmental, social and economic impacts and performance. This information is published annually in the Sustainability Report and includes consolidated data:</p> <p>https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf</p> <p>Kaiser Corporate annually publishes financial information and other elements of performance and governance as required under the Securities Exchange Act 1934 (Form 10-K), which is available on the government website https://www.sec.gov/</p> <p>The quarterly financial statements is also available at: https://investors.kaiseraluminum.com/overview/default.aspx</p>
3.2 Non-compliance and liabilities	Conformance	The Entity reports and publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with the applicable law in its annual Financial and Sustainability Reports.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity does not have, nor is associated with any political action or committee and does not make any payment to the Government unrelated to tax requirements.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established mechanisms to address complaints, claims, or requests for information. It has an open line (toll-free 1-866-204-9793) and an email account (info@getintouch.com).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity maintains a Life Cycle Assessment Report of its major production lines (i.e. Plate, Sheet and Coil, Food and Beverage, Can Sheet, Soft Alloy Extrusions, Seamless and Structural Extruded and Drawn Tube, Hard Alloy Rod and Bar, wire and Rod, Redraw Rod, Forge Stock and Hard Alloy Shapes) undertaken by a third-party. The LCA adheres to the same methodology used by the International Aluminium Institute (IAI) and the methodology used in the assessment for intermediate product manufacturing according to the European Aluminium Association project. The Entity has expansion activities in progress

CRITERION	RATING	COMMENT
		and in turn some material changes to its operations, so this LCA must be updated once the changes impact the site.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed a cradle-to-gate Life Cycle Assessment, which can be provided upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has not yet communicated the results of the Life Cycle Assessment information publicly, so it has not yet been required to provide public access to LCA information.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimises the generation of Aluminium Process Scrap within its operations and, where generated, targets 100% of Scrap for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys and grades for recycling where available.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has included a strategy to recover skeletons and other Aluminium Scrap/Waste from its direct customers. The Entity has a contract with a third party to treat and recycle coated Aluminium.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has established processes to obtain and recycle the material Scrap generated from Aluminium, which is then reprocessed and recycled. It undertakes campaigns to promote recycling through local media as well as installing collection points or containers within the community.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity manages and provides GHG emissions data to the Corporate office and has a process to make the account and data analysis, methodology for calculating and recording Material GHG emissions and energy use is documented by source. The Corporate department of analysis and planning compiles the information monthly to be provided to the public through the Kaiser Sustainability Report. The Entity also annually reports its GHG emissions to the relevant Government Authority, which are publicly disclosed on the government webpage at: https://enviro.epa.gov/envirofacts/ghg/facility-report?facilityId=1014352&selectedReportingYear=2021&repDeadLine=2022-08-12

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	The Entity has established GHG Emissions intensity reduction and time-bound targets and has implemented a reduction plan. The GHG reduction targets and plans are outlined in the sustainability report published on its website. The Entity has stated that by 2030 it will reduce Scope 1 & 2 emissions by 20% and Scope 3 emissions by 35% with a combined reduction of 30%. The Plan also includes the actual GHG Emissions for Scope 1 and 2 data as well as the reduction amounts. https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.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	Minor Non-Conformance	The Entity quantifies and reports its Emissions to Air, complying with quarterly, semi-annual and annual reports. The Entity holds a valid Air Permit issued by local authorities. However, the Entity does not implement specific emissions mitigation plans.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports its Discharges to Water that could adversely affect humans or the environment and implements plans to minimise these adverse impacts. The Entity has an agreement of water discharge with the previous owner (Alcoa), who owns the discharge permit, which establishes the terms of Discharge to Water as well as to the Entity and is also required under the local laws and requirements.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted an Aspects and Impacts Assessment to identify major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. This is required under its Indiana Department of Environmental Quality Title V Permit and contractual obligation to its Lessor's NPDS Permit. The Entity has developed and implemented a Spill Prevention, Control and Countermeasures Plan, which was last updated in June 2022.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	The Entity has established controls as part of regulatory requirements for any Spills or Leakages. However, during the Audit, several concrete secondary containments were observed with poor maintenance (e.g. containing water inside or mud or plants growing inside), trenches filled with mud and Dross dust around the baghouse Hazardous Waste containers area.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has a legal obligation under the Local Environmental Laws to disclose to affected parties the volume, type, and potential impact of significant Spills immediately after an incident. This is also a requirement of Spill prevention, control, and countermeasure regulations and as part of the Facility Response Plan (FRP).
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity maintains a section in its Sustainability Report titled 'Waste and Spill Management' regarding its policy to publicly disclose any material spill or leak and related information annually. It outlines the reporting criteria and responsibilities and who internally and externally needs to be informed based on the severity of the occurrence, either by type of spill or amount, in its Facility Response Plan (FRP). No spills occurred at the Entity during 2023.
6.5a Waste management and reporting (strategy)	Conformance	The Entity's Waste Management Plan includes the identification, classification, point(s) of generation, descriptions, storage, methods of disposal, inspection frequency, and accountability of all waste streams. Each waste stream is accompanied by a detailed procedure and respective forms.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity is regulated under Local Environmental Laws and classified as a large quantity generator to disclose the quantity of Hazardous and Non-Hazardous Waste generated and associated Waste disposal methods. Some of this information is publicly available through the authority webpage: https://enviro.epa.gov/facts/tri/ef-facilities/#/Facility/4763WKSRLM4WSTA The Entity's total Hazardous Waste generation is publicly disclosed through its Annual Sustainability Report. https://www.kaiseraluminum.com/files/misc/2023_Sustainability_Report.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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.
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 has implemented processes for Dross recovery and storage, including internal storage, requirements for transportation. The Entity ensures maximum recovery of Aluminium by treating Dross and Dross residues through a third-party contractor.
6.8b Dross (recycling)	Conformance	The Entity maximises the recovery of Aluminium by treating Dross and Dross residues through the implementation of processes for on-site dross management, transportation of Dross, selection of Dross processors, and management of Dross residues. The Entity uses a third party for recovery and to monitor the recovery yield.
6.8c Dross (review of alternatives)	Conformance	The Entity regularly reviews alternative options for landfilling its Dross residues. The Aluminium Association, which provides global standards, industry statistics, and expert knowledge to member companies and Policymakers in the United States, supports the outcomes.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its Water withdrawal and uses by source and type to ensure the sustainable management and protection of water resources and ecosystems in and around its environment. As contractually required by its Lessor and local authority, it adopts a catchment-based approach.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its Water Risks in Watersheds in its Area of Influence. A Water Risk Assessment was conducted with the regulatory authority, and no adverse impacts to the watershed were found.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable to the Entity as the water risks have been assessed as low.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable to the Entity as the water risks have been assessed as low.
7.3 Disclosure of water usage and risks	Not Applicable	This Criterion is not applicable to the Entity as the water risks have been assessed as low. Water withdrawal is reported via the Kaiser Sustainability Report.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks and Materiality of Biodiversity impacts from land use and activities in its Area of Influence. The assessment applies to the Entity's Biodiversity framework, which uses a mitigation hierarchy of avoidance, minimisation, mitigation, and offset to manage any identified Material risk to Biodiversity. In the Entity's 2023 Biodiversity risk assessment, no Material risks on Biodiversity were identified. The Entity maintains an offset area as a buffer zone.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's Biodiversity risk assessment has determined that there are no Material risks within the Entity's Area of Influence; therefore, no action plans are required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity risk assessment determined that there are no Material risks within its Area of Influence. Therefore, no action plans are required. However, the Entity shares the results of its Biodiversity risk assessment with the Local Community Advisory Board as part of its Stakeholder communication process.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	The Entity shares the results of its Biodiversity risk assessment outcomes with Stakeholders and periodically updates and reports publicly on an annual basis.
8.3 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The Entity's Biodiversity assessment has identified wooden pallets as a potential medium for the introduction of Alien Species. The Entity mitigates this potential by requiring the pallet supplier to treat the wooden pallets prior to use.
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.
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 maintains a Human Rights Policy which establishes Kaiser's commitment to respect Human Rights. The Policy is available on the Entity's webpage and is communicated to employees during onboarding.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity's policies are guided by the International Bill of Human Rights principles and the International Labor Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work. However, the only Human Rights Due Diligence was conducted by Alcoa, and has not been updated with Kaiser's existing conditions or aligned with its core values, policies, and responsibilities.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its business, including a Policy commitment to respect Human Rights, a Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on Human

CRITERION	RATING	COMMENT
		Rights, and as such impacts are identified, provides for remediation through legitimate processes. The Entity's Policies are guided by the International Bill of Human Rights principles and the ILO Declaration on the Fundamental Principles and Rights at Work.
9.2 Women's Rights	Conformance	The Entity has implemented Policies including the Code of Business Conduct and Ethics and the Diversity, Equity, Inclusion & Belonging Policy, which describe its commitment to equal opportunities in all aspects of employment. It has also maintained its gender equity strategy from the previous owner, Alcoa, which is focused on equity and strengthening women's network actions.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within its Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within its Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity as there are no Cultural or Sacred Heritage sites within its Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity as there has been no physical and/or economic displacement resulting from the establishment of the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity as there has been no physical and/or economic displacement resulting from the establishment of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. This is reflected in the Entity's Policies, including the Diversity, Equity, Inclusion, and Belonging Policy, the Human Rights Policy, Supplier Code of Conduct, and the Environmental Policy.
9.7b Local Communities (impacts)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. This is reflected in its Policies, including the Diversity, Equity, Inclusion, and Belonging Policy, the Human Rights Policy, Supplier Code of Conduct, and the Environmental Policy.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. This is reflected in its Policies including the Diversity, Equity, Inclusion, and Belonging Policy, the Human Rights Policy, Supplier Code of Conduct, and the Environmental Policy.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity states in its Supplier Code of Conduct that it expects its suppliers to comply with all laws and regulations relating to Human Rights and conflict minerals, including providing a claim of assurance that the products have been manufactured using minerals sourced from conflict-free countries. Kaiser also requires suppliers to have internal processes in place for sourcing conflict-free minerals.
9.9 Security practice	Conformance	The Entity directly employs its security staff who are subject to the same policies and induction training as other staff regarding respect for Human Rights in line with recognised standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under applicable law, which is governed by National and State law and in accordance with ILO Conventions C87 and C98.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity declares in its Policies that it respects Workers' rights to Freedom of Association and to Collective Bargaining, which is aligned with corporate values. This is reflected in its current conditions, where most of the Entity's Workers are unionised.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	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 (minimum age)	Conformance	The Entity does not support nor engage in the use of Child Labour and complies with related national and international law. The Entity's Human Rights Policy refers to accepted labour practices.
10.2b Child Labour (hazardous)	Conformance	The Entity does not support nor engage in Child Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors to not engage or support Child Labour.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	The Entity does not support nor engages in the use of Child Labour and complies with related national and international law, including not engaging in or supporting Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. The Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. Thus, the Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. Thus, the Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. Thus, the Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. Thus, the Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not support nor engage in the use of Forced Labour. This is also expressed in the Entity's Supplier Code of Conduct, which establishes the requirements for its contractors not to engage in or support Forced Labour. Thus, the Entity does not require a deposit, fee, or other security payment from its Workers, nor does it retain identity papers. It also does not restrict Workers' freedom of movement or freedom to terminate employment without penalty.
10.4 Non-Discrimination	Minor Non-Conformance	The Entity established processes that ensure equal opportunities and do not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities, or termination of any Worker based on gender, race, national or social origin, religion, or age. The Collective Bargaining Agreement reinforces corporate Policies on equal employment opportunities, Human Rights, and the Code of Ethical Conduct at the local level. However, the Entity has not provided training or ensured the effectiveness of training of key personnel to ensure potential bias in hiring is recognised and communication with unsuccessful applicants is effective.
10.5 Communication and engagement	Minor Non-Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolving workplace and compensation issues. The Entity has implemented different mechanisms to address complaints, claims or requests for information. The Entity has an open line (toll-free 1-866-204-9793) and an email (info@getintouch.com), known as InTouch, operated by a third party, available 24/7 where Stakeholders can make anonymous reports if desired, reporting any matter related to the Code of Conduct and Ethics, accounting, audit, harassment, Discrimination, theft, among other topics. The Entity's Board of Directors supports this program and follows up on the closure of cases. More information on this program is available at:

CRITERION	RATING	COMMENT
		https://www.kaiseraluminum.com/files/compliance/InTouch.pdf However, the Entity previously held staff meetings communicating relevant site information such as performance metrics, trends and goals. However, this was suspended due to the COVID-19 restrictions and has not yet been reinstated.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based violence, including sexual harassment or verbal abuse of Workers. The Entity's Policies, including its Supplier Code of Conduct, reflect these actions.
10.7a Remuneration (living wage)	Conformance	The Entity continues negotiating the wages for unionised employees with the United Steel Workers Union. These are established following the Collective Bargaining Agreement, and the remuneration package for all employees exceeds the national minimum wage, making it very competitive in the local marketplace.
10.7b Remuneration (method of payment)	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week shall always meet at least a legal or industry minimum standard. The wages paid are more than the US national minimum wage, sufficient to meet the basic needs of Workers and to provide discretionary income. Payments are made in a timely manner, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity has implemented Policies and processes to comply with Applicable Law and industry standards regarding Working Time, including Overtime hours, public holidays and paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Minor Non-Conformance	The Entity has implemented, communicated, and regularly reviewed its Occupational Health and Safety Policy, which has been endorsed by senior management and is supported through the provision of adequate resources. However, this document includes information from the previous owner (Alcoa) and requires revision.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity communicates its EHS Policy to all employees, visitors, and contractors. The training of new Workers includes the Policy review as part of the initial training, and visitors are required to

CRITERION	RATING	COMMENT
		observe an EHS visitor training video. All contractors review the Policy through the Entity's Contractor Orientation before accessing the Entity's facilities.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy includes a commitment to comply with all applicable environmental, health and safety laws and regulations.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's EHS Policy states, 'We will not compromise our environmental, health, or safety values for profit or production.' The Policy provides the stop authority to all employees if they identify any hazard that may place their health or safety at risk. This is also communicated as part of the annual EHS training provided for all employees.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System that is independently audited for conformance with applicable national and international standards. However, various substandard conditions for safety elements and hazards were observed during the Audit.
11.3 Employee engagement on health and safety	Conformance	The Entity is contractually obligated to provide Workers with mechanisms by which they can raise, discuss, and participate in the resolution of OH&S issues with management. The Entity has processes where each department has elected safety representatives based on shift, area or craft who can raise, discuss and participate in the resolution of OH&S issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance as part of its continuous improvement process, where it measures its performance through the use of leading and lagging indicators.

Document Control and Version History

Revision	Date	Notes
0	29 April 2021	Initial Certification Audit – Provisional Certification
1	16 February 2022	Surveillance Audit – Full Certification
2	12 November 2024	Surveillance Audit